

1 **UNITED STATES DISTRICT COURT**
2 **FOR THE DISTRICT OF NEW JERSEY**

3 **IN RE: VALSARTAN, LOSARTAN,**
4 **and IRBESARTAN PRODUCTS**
5 **LIABILITY LITIGATION**

CIVIL ACTION NUMBER:
 1:19-md-02875-RMB-SAK
 Deposition Designations
 via TEAMS videoconference

6
7
8 Mitchell H. Cohen Building & U.S. Courthouse
9 4th and Cooper Streets
10 Camden, New Jersey 08101
11 Tuesday, October 8, 2024
12 Commencing at 1:00 p.m.

13 **B E F O R E:** **THE HONORABLE THOMAS I. VANASKIE (RET.)**
14 **SPECIAL MASTER**

15 **A P P E A R A N C E S:**

16 HONIK LLC
17 BY: DAVID J. STANOCH, ESQUIRE
18 1515 Market Street, Suite 1100
19 Philadelphia, Pennsylvania 19102
20 Co-Lead Counsel for MDL Plaintiffs

21 KANNER & WHITELEY, LLC
22 BY: CONLEE S. WHITELEY, ESQUIRE
23 701 Camp Street
24 New Orleans, Louisiana 70130
25 Co-Lead Class Counsel for Third-Party Payor Economic Loss

 John J. Kurz, Official Court Reporter
 John_Kurz@njdcourts.gov
 (856) 576-7094

 Proceedings recorded by mechanical stenography; transcript
 produced by computer-aided transcription.

A P P E A R A N C E S: (Continued)

NIGH GOLDBERG RASO & VAUGHN, PLLC
BY: MARLENE J. GOLDBERG, ESQUIRE
14 Ridge Square NW, Third Floor
Washington, D.C. 20016
Co-Lead Class Counsel for Third-Party Payor Economic Loss

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP
BY: JESSICA DAVIDSON, ESQUIRE
One Manhattan West, Suites 42-128
New York, New York 10001
Counsel for Defendants Zhejiang Huahai Pharmaceutical Co.,
Ltd., Huahai U.S., Inc., Princeton Pharmaceutical, Inc., and
Solco Healthcare U.S., LLC (collectively ZHP)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP
BY: NINA R. ROSE, ESQUIRE
1440 New York Avenue, N.W.
Washington, D.C. 20005
Counsel for Defendants Zhejiang Huahai Pharmaceutical Co.,
Ltd., Huahai U.S., Inc., Princeton Pharmaceutical, Inc., and
Solco Healthcare U.S., LLC (collectively ZHP)

GREENBERG TRAUER LLP
BY: VICTORIA DAVIS LOCKARD, ESQUIRE
STEVEN M. HARKINS, ESQUIRE
3333 Piedmont Road, NE, Suite 2500
Atlanta, Georgia 30305
Counsel For Defendants Teva Pharmaceutical Industries Ltd.,
Teva Pharmaceuticals USA, Inc., Actavis LLC, Actavis Pharma,
Inc. (collectively Teva)

KIRKLAND & ELLIS LLP
BY: VINCENT-ALEXANDRE FOURNIER, ESQUIRE
601 Lexington Avenue
New York, New York 10022
Counsel for Defendants Torrent Pharma, Inc. and
Torrent Pharmaceuticals Ltd. (collectively Torrent)

Also present:

Larry MacStravic, The Courtroom Deputy

Loretta Smith, Esquire, Judicial Law Clerk to the Honorable
Robert B. Kugler (Ret.)

1 (PROCEEDINGS held via remote TEAMS videoconferencing
2 before the Honorable Thomas I. Vanaskie (Ret.), Special Master,
3 at 1:00 p.m. as follows:)

4 THE COURT: Are you able to hear me?

5 Good afternoon. And are we ready to proceed with
6 discussions on deposition designations for Teva-related
7 witnesses?

8 MR. STANOCH: Yes, Judge.

9 THE COURT: All right. Now, I have the designations
10 and counterdesignations and objections on the spreadsheet for
11 Mr. Binsol.

12 Where do things stand with respect to Mr. Nudelman?

13 MS. LOCKARD: So, Your Honor, at the last hearing you
14 had asked that we go ahead and provide Mr. Binsol -- or excuse
15 me, Mr. Nudelman and Mr. Barreto to plaintiffs' counsel, even
16 though we had a reservation about that because we felt like we
17 needed Judge Bumb's ruling on the "general cause" issues, and
18 also because there was an outstanding dispute about whether
19 plaintiffs could play designations of Mr. Barreto if he was
20 being called live. And Your Honor instructed us to go ahead
21 and provide those. So I did provide Nudelman's. We're
22 finalizing Barreto's today. And I plan to get that over to
23 plaintiffs' counsel.

24 But from my perspective, Nudelman is ready for Your
25 Honor. But I believe Mr. Stanoch had sent an email that said

1 we should wait until Judge Bumb rules, which was our initial
2 position.

3 MR. STANOCH: I was just summarizing Ms. Lockard's
4 position, Your Honor. I don't think we should wait, but I was
5 just being fair in an email to Your Honor to convey what I
6 thought Ms. Lockard said. And it sounds like I was right.

7 (Laughter.)

8 THE COURT: Well, I understood your email, David, to
9 be suggesting that we defer Mr. Nudelman until after Thursday;
10 and I'm inclined to do that. I'm sorry for that, Victoria,
11 because of all the effort that was put in to get those
12 designations to me. But I am inclined to defer until after
13 Thursday.

14 But we are prepared to address Mr. Binsol today. And
15 Mr. Barreto is in a different category.

16 MS. LOCKARD: Right. Mr. Barreto is in a different
17 category. But we're going to get those because Your Honor
18 instructed us to, and we're fine to do that. It's just he's
19 got -- even though counsel has cut down the designations
20 significantly, I see that now as I'm going through them, but it
21 is two days of deposition, so it was a rather long deposition.
22 And I think there are, you know, over 200 rows that were
23 originally designated that have been revised.

24 So even though counsel has cut those down, I still
25 have to go through and see what was taken out and is it

1 something that we are missing a counter to and so forth. So
2 it's just taking a little bit of time. But I'm committed to
3 getting that over to Mr. Stanoch, you know, this evening, you
4 know, after today, after this evening.

5 THE COURT: All right. And is it all right to defer
6 Mr. Nudelman until after Thursday?

7 MS. LOCKARD: No objection to that. I thought we
8 should do that -- I think it would probably be more efficient
9 for everybody if we do that, so...

10 THE COURT: Okay. That's what we're going to do
11 then.

12 So the only witness we'll address today is
13 Mr. Binsol. All right.

14 MR. STANOCH: Yes, sir.

15 THE COURT: And I've had the first dispute with
16 respect to Mr. Binsol appearing on page 41 of his deposition.

17 MS. LOCKARD: So the first -- I had a question mark
18 just on the initial designation on page 23, Judge. And the
19 issue that I just wanted to raise is, you know, in prior
20 designations, we had initially designated or counterdesignated
21 background information for these witnesses to provide their
22 role and some basic educational information and plaintiffs cut
23 that. They didn't want to play the educational information or
24 even in some instances the role or the title of the witness at
25 Teva, and they've been saying, well, we can just announce who

1 this witness is and what their role is and we don't need their
2 educational background.

3 But in this witness's instance --

4 THE COURT: Right.

5 MS. LOCKARD: -- they take a different position. And
6 my only conclusion can be because Mr. Binsol went to community
7 college and got an online degree. And I think it's a bit
8 prejudicial if they want to play his educational information
9 but they don't want to let us play as a counter the educational
10 background of our other witnesses who have Ph.D.s from notable
11 universities.

12 So I don't have a strong legal objection to this, but
13 I just think it's a little bit inconsistent and unfair.

14 THE COURT: All right. David.

15 MR. STANOCH: Your Honor, if there's no formal legal
16 objection, then I don't think there's a dispute, and I don't
17 have a legal argument I need to make back.

18 I am designating -- we're designating here testimony
19 about a Teva witness. It's nothing about this designation that
20 there is anything objectionable.

21 In fact, you know, like Ms. Lockard said, in the
22 context of other objections, they are putting in affirmatives
23 and counters we have seen for three weeks about background and
24 positions they held. So I don't think there's any issue for
25 you to decide here. If there's no formal objection is what I

1 heard, then I think the testimony comes in. I mean, especially
2 it's certainly, you know, relevant and probative about the
3 witness and his 30(b)(6) and 30(b)(1) capacity. So I'm not
4 sure what more I need to say, Your Honor.

5 MS. LOCKARD: Well, I said I don't --

6 THE COURT: Well, I am a little bit concerned about
7 highlighting the fact that he's got a community college degree
8 and then online degree after that. It just does strike me as
9 somewhat strange that you designated his educational background
10 but not the educational background of other witnesses.

11 MR. STANOCH: I'm still not sure, Your Honor, even
12 with that about what the objection -- the legal objection is to
13 the admissibility of this testimony.

14 It's certainly probative of this witness who unlike
15 all of the other witnesses, Your Honor, we've heard for weeks
16 that he will be talking about quality issues and we'll have
17 someone from Teva about quality, this is the person, and we
18 will see, talking about testing, knowledge, information of
19 NDMA, et cetera, et cetera. So his background certainly is
20 probative and relevant. So I don't think there's an issue with
21 that.

22 And, you know, if he was on the stand, if he was
23 live, obviously we could or could not call him for that. And
24 Teva has designated affirmatives or counters for the other
25 witnesses we've seen to this point on this. So, again, I don't

1 understand what legal objection or basis there would be to
2 preclude this testimony.

3 And, frankly, I'm being honest, I still haven't heard
4 other than they don't like potentially an inference a jury may
5 draw that their quality designee has an Associate's degree and
6 then a liberal arts background in French business, not in cGMP
7 or biochemical pharmaceutical testing, but that's argument, and
8 the jury can hear that information and take from it what they
9 will or will not.

10 THE COURT: All right. Victoria.

11 MS. LOCKARD: Well, we did not -- we had initially
12 counterdesignated our other witnesses' educational background
13 and plaintiffs objected to that. This is before, Judge
14 Vanaskie, before you saw, this was back in the negotiation
15 stage. And we took out our counters for the other witnesses on
16 the education piece. And we did propose counters for their
17 title or their role, which Your Honor looked at.

18 But we took out all of our counters that had their
19 educational background, because, you know, in fairness,
20 plaintiffs said, well, it's their testimony and if they didn't
21 want to play the educational background, we could play it in
22 our affirmatives.

23 But here, I mean, I said I didn't have a strong legal
24 objection, I do have a prejudice objection, and I do have a
25 611(a) objection, because I do think this is somewhat intended

1 just to embarrass and harass the witness about the strength of
2 his educational background.

3 And, again, the reason I am putting it the way I am
4 is because if they had put in educational background on all the
5 other witnesses, then certainly I wouldn't object to this.
6 It's the truth. And, you know, if educational background is
7 relevant to one witness, then it's relevant to all I guess
8 would be my position. And if they're saying it's not relevant
9 to the others, then why suddenly is it now relevant to this
10 witness?

11 THE COURT: Go ahead, David.

12 MR. STANOCH: Your Honor, I don't want to belabor
13 this. We are permitted to put in the designations and play the
14 party opponent testimony we would like as we choose. I don't
15 understand how it's prejudicial to disclose a witness's
16 educational background. I'm now hearing it's a prejudice
17 objection so we're in the 403 world. I do not see how it's
18 unduly prejudicial.

19 Teva hired this person. He worked at Teva for a
20 number of years and now Teva's not prepared to let a jury know
21 what qualifications their employees do or do not have. I
22 disagree that that's unduly prejudicial.

23 And what might have been done for some other witness
24 or the other, I don't have in front of me, and this issue
25 wasn't raised before. And if they want to counterdesignate or

1 affirmatively designate, they can argue for something else
2 about this witness or any other witness which they had dealt
3 with before. They've had these designations since February, as
4 they did with all the other witnesses. This is not -- no
5 surprise here. We're not trying to pull a fast-one.

6 THE COURT: Yeah. I understand your concern,
7 Victoria, but I have to say that this is proper examination of
8 a witness. Background is important in some instances. In some
9 instances, it isn't. I can't speak for what you withdrew at
10 the request of the plaintiff with respect to other witnesses.
11 I know there's a lot of time pressure on counsel and so that
12 might have influenced what was withdrawn.

13 But I don't have a basis to grant this objection.
14 Its prejudicial nature does not substantially outweigh its
15 probative value. All right.

16 MS. LOCKARD: Understood. I won't -- I won't say
17 anything more on that one.

18 THE COURT: All right. And now do we go to page --

19 MS. LOCKARD: I think 41.

20 THE COURT: That's what I had, 41.

21 MS. LOCKARD: And it looks like plaintiffs withdrew
22 everything except line 5 to 6 on page 41. So we are agreeable
23 to that. We can keep in the answer.

24 THE COURT: All right. So nothing to decide with
25 respect to row 4 of the spreadsheet.

1 MR. STANOCH: Agreed.

2 THE COURT: I think that takes us to row 5 of the
3 spreadsheet.

4 MR. STANOCH: Right.

5 MS. LOCKARD: Right. So row 5 we objected to this
6 based on relevance, prejudice, misleading, and in addition,
7 Judge Bumb had ruled on MIL 11 which relates to Teva's API
8 suppliers other than ZHP. And this really gets into the whole
9 piece of the case involving Mylan, and the Mylan API was used
10 at Teva's Jerusalem facility.

11 Remember the ZHP API was used at Teva's Malta
12 facility, which we do agree is relevant. But this line of
13 questioning goes to the Mylan product being used in the
14 Jerusalem facility, why that facility closed. And, you know,
15 as Judge Bumb said in her comments, that this is really taking
16 us down a path where we don't need to be.

17 THE COURT: All right. David.

18 MR. STANOCH: Your Honor, and this -- I'm going to
19 step back for just two seconds to give some background because
20 I think it will apply to some other questioning here.

21 We're not trying to prove anything with -- about
22 Mylan's API.

23 Three and a half years ago when I deposed Mr. Binsol,
24 I had to depose him as a 30(b)(6) and 30(b)(1) on Teva's use of
25 both ZHP and Mylan API because they were buying both at the

1 same time.

2 This document I have in front of him, right, while
3 it's a Teva business record, and I use it, and you'll see in
4 the questions, use it to go through principles about NDMA, NDMA
5 formation, the ICH M7 guidelines that Teva put in its own
6 document, in its own business record.

7 Now, the fact that the document initially might have
8 been about Mylan I think is not the point and should not be
9 determinative here, because I'm not using anything here to
10 prove anything about Mylan or open the door to Mylan or waste
11 the jury's time on Mylan API at all. But this goes to
12 knowledge, information of NDMA and the feasibility of knowing
13 how NDMA is formed, as Teva writes generically in this
14 document, right, about NDMA, and nothing really about NDEA and
15 Mylan, right?

16 If there's something specific here in this
17 designation or in an ensuing one, I'm happy to find a way to
18 potentially scrub out the word "Mylan." I don't think there's
19 a reference of Mylan in this answer.

20 I think the question and answer that's designated
21 focuses on general information that was in the record that was
22 talking about NDMA. That's the portion I was focused on. It
23 was not focused on this questioning about, you know, oh, for
24 example, oh, Mylan's valsartan API contained NDMA, is that
25 right, and then your Jerusalem facility closed. None of that

1 is in this or in the ensuing designations.

2 Because what Your Honor will see is this document and
3 another will be used to establish the foundation for the
4 witness's 30(b)(1) and 30(b)(6) knowledge about the topics he
5 was designated on, which include the evaluation and knowledge
6 of risks about the creation of nitrosamines. And I'm going to
7 use that document to establish that and walk through it.

8 So, again, if there's something specific that they
9 think is going too far into the Mylan's "story," I'm happy to
10 address it. But I don't think this designation does that. And
11 just because the document elsewhere might say "Mylan NDEA,"
12 that's not what this designation is about.

13 THE COURT: All right. Victoria.

14 MS. LOCKARD: So, first of all, this is -- they are
15 trying to get in information about the root cause of the
16 formation of the nitrosamines, and there's going to be a
17 hundred other documents that establish this. Presumably, by
18 the time Tony Binsol testifies, all of that will have been well
19 presented.

20 So I don't think that -- I think it's going to be
21 cumulative, and it's not relevant to this witness when it's
22 coming in through the Mylan and Jerusalem story. And so in the
23 way that it's presented here with reference to this document
24 and setting it up through the Jerusalem facility, I do feel
25 like this is more prejudicial than relevant. It opens up this

1 whole issue about Mylan and Jerusalem unnecessarily, and it
2 adds confusion to the jury.

3 I mean, I'm looking, I'm hearing what counsel is
4 saying, and if there is a way to --

5 MR. STANOCH: And --

6 MS. LOCKARD: I mean --

7 MR. STANOCH: I'm sorry. Go ahead, Ms. Lockard. I'm
8 sorry.

9 MS. LOCKARD: There is a reference to bullets. But I
10 don't have necessarily a problem with talking about the
11 potential formation, you know. But the issue here, this
12 document with Mylan it's talking about, it goes beyond just
13 what happened in the ZHP root cause. It's saying, well, here
14 are some other ways that nitrosamines can form, some of which
15 don't even apply to the ZHP case.

16 So I really think this is prejudicial, not relevant,
17 it's confusing. I don't want to -- I don't think they need
18 this.

19 THE COURT: Well, why don't you talk about "need,"
20 David, in terms of using this document to present this kind of
21 information to the jury.

22 MR. STANOCH: Yes, sir.

23 This was the document we used because it was a more
24 recent and more robust document, a Teva business record, that,
25 yes, it was talking about Mylan NDEA in part, because

1 temporally the issues came up in June with ZHP and then a few
2 months later with Mylan, right? So this document is inclusive
3 of all of that information before that.

4 And, again, four years ago we had no idea that two
5 and a half weeks before a subclass trial, right now, that
6 maybe, oh, we might have severed or bifurcated or informally
7 cut out the "Mylan story" because that did not happen until
8 much, much, much more recently. And it would be unduly
9 prejudicial to plaintiffs to undermine the foundation and
10 testimony, and you'll see this is testimony about NDMA
11 formation generally.

12 And, again, I'm fine cutting out -- if you want to
13 cut out part of this designation, Ms. Lockard, that says "this
14 is a report at the Jerusalem facility," I'm fine. But then it
15 goes on and says there's a discussion about "the formation of
16 nitrosamines during the tetrazole ring step," right. And it
17 talks about the conditions of which nitrosamines can form
18 during the valsartan API manufacturing process, yes.

19 These are all generic things, right, about the
20 knowledge and feasibility of NDMA formation, which this witness
21 testified on. And it would be unfair to plaintiffs to say, oh,
22 well, four years later you should have known that any document
23 that also mentions somewhere else "Mylan" should have been out
24 and then these general questions and answers, which were just
25 used with the document to move the things along with the

1 witness who was testifying -- who should have been able to
2 testify about these anyway from heart, but of course I wouldn't
3 make him say, "give me all of the reasons for formation of
4 nitrosamines." We use a business record to prompt that
5 questioning, of course. That's how you do it. And that's what
6 we did.

7 It would be unfair to us to say, well, sorry, you
8 used a document that says "Mylan" on the first page. You know,
9 you should have used one for ZHP because you should have
10 anticipated the first trial is going to be about ZHP. You lose
11 all of the foundational testimony about nitrosamine formation.

12 I think we can address this by either not showing the
13 document during the clip or -- and taking out part of the
14 designations that say anything -- and I thought we did -- that
15 says anything about "Jerusalem" or "NDEA" or "Mylan," I'm
16 perfectly happy to do that.

17 MS. LOCKARD: I think --

18 MR. STANOCH: But otherwise the entire testimony
19 we're going to have here from Mr. Binsol, it's all going to
20 fall apart because we were using this to show his knowledge,
21 his and Teva's knowledge about the formation and creation of
22 nitrosamines, generally.

23 THE COURT: All right. Victoria.

24 MS. LOCKARD: Right. So but this -- but you're not
25 using it to show their knowledge prior to the issue, because

1 this is a document that came out later.

2 And so, you know, part of the confusion is, you know,
3 when you take the document away, I mean, it makes it seem like
4 you're just asking this witness about his general knowledge of
5 how nitrosamines were formed.

6 I'm willing to negotiate. Maybe what -- maybe what
7 we should do is try to offline talk about this one, because
8 some of the information, I believe, is probably okay. But the
9 reference to the document is problematic. The reference to
10 things that didn't relate to ZHP, like the cross-contamination
11 from the water supply, you know, that is not relevant to ZHP.
12 And it's a five -- it covers five pages of testimony, so I do
13 think it could be cut down significantly.

14 THE COURT: All right. Here's what I'm going to
15 suggest: That you and David, you, Victoria, and David confer
16 on the designations from page 43 to 48 with a view towards
17 reducing, to the extent you can, those designations that still
18 enables David to get the information before the jury that he'd
19 like to present, all right, and report back to me by Thursday.

20 MS. LOCKARD: Okay. I'm happy to do that.

21 MR. STANOCH: Yes, sir.

22 MS. LOCKARD: I think this probably applies to the
23 next row as well.

24 MR. STANOCH: I agree.

25 THE COURT: Let me get to the next row.

1 So this would be row 6?

2 MR. STANOCH: Yes, sir.

3 THE COURT: All right. So I'll ask you to confer on
4 rows 5 and 6 and report by Thursday.

5 MR. STANOCH: Yes, sir.

6 THE COURT: So does that take us now to row 7?

7 MR. STANOCH: I believe it does, Judge.

8 THE COURT: And that would be at page 56 of
9 Mr. Binsol's transcript.

10 MS. LOCKARD: Right.

11 So, we made a number of objections to this particular
12 designation. And just to set this up, I mean, it appears
13 they've jumped now -- the testimony has jumped from talking
14 about the Teva Jerusalem investigation report of the Mylan
15 issue, which we just talked about, to now a Mylan document
16 that's providing responses to questions from Teva.

17 So, what has happened essentially in this period of
18 time is the ZHP issue has come to light. Teva is now
19 questioning other suppliers, such as Mylan, about their
20 process, do they have a similar process, do they have similar
21 nitrosamine issues, and Mylan is sending responses back.

22 So our objection in part is hearsay because there's
23 no Mylan witness in this trial. And the responses from Mylan,
24 there's no one here to, you know, testify to explain the
25 responses from Mylan. So we do think even though they're

1 contained within a business document at Teva, I don't think
2 that gets all the way through -- through the hearsay within the
3 hearsay problem.

4 There's also foundation, relevance and prejudice
5 argument for the same reasons that we're now jumping into
6 discussions about, you know, Mylan's responses. Again, it's
7 misleading, confusing.

8 So I'll just stop there.

9 THE COURT: Thank you. All right. David.

10 MR. STANOCH: Your Honor, I think it's a similar
11 issue. Unfortunately, again, this document was being used
12 three, four years ago, right, to establish -- and this is, you
13 know, it's a document, it's a Teva document in Teva's records,
14 right? And these are responses to Teva's questions. So it
15 certainly goes to Teva's knowledge of the formation of NDMA and
16 the feasibility of being able to know about the potential
17 formation of NDMA and to be able to characterize or identify
18 NDMA, right, which, again, are part of the topics that were
19 noticed per agreement with this witness.

20 I don't want to punt everything --

21 THE COURT: Sure.

22 MR. STANOCH: -- and come back to Your Honor in a day
23 or two. But I don't think it would be appropriate to keep all
24 of this out simply because we're looking now at a document
25 responding to Teva's questions and the witness is saying yes,

1 that's right, that's right, in terms of formation and
2 feasibility of NDMA because that's going to form the basis of
3 ensuing questions in his testimony. Again, if there's some
4 overconcern about something in particular, do we black it out,
5 do we redact it, do we mute it out when they say it
6 potentially?

7 I also don't think -- I would suggest that Judge
8 Bumb, you know, didn't say the word "Mylan" could not be said
9 here, right? We're not trying to prove anything about the
10 Mylan API, of course.

11 But, you know, they're a party opponent obviously in
12 the case, and regardless of what -- you know, for a number of
13 nonhearsay purposes, even if you put that aside, for the
14 knowledge and notice of Teva about the potential feasibility
15 and formation of NDMA, that's still germane to the noticed
16 topics, regardless of -- you know, we're not trying to prove
17 anything per se through this. This is establishing the
18 witness's foundation about NDMA formation, right, which he
19 embraces in this document that were in Teva records, and then
20 it's used in subsequent questions.

21 So I'm not sure if I have a good answer for Your
22 Honor, or if we should try to talk about it, Ms. Lockard and I,
23 or if there's something you think more specific maybe we should
24 focus in on here.

25 MS. LOCKARD: Well, on this particular -- let's just

1 take this one designation at a time. So this particular
2 designation, all it says is, you know, here's a discussion
3 about the conditions that lead to the formation of NDMA, and
4 that includes presence of a solvent called dimethylformamide,
5 DMF, and the presence of sodium nitrite under acidic
6 conditions. And so that by the time Tony Binsol gets up, like
7 that will have been well established. So I don't know why we
8 need to use a hearsay document to get into that with him.

9 I mean, I understand it's difficult. That's part of
10 the problem of piecing these together from a video deposition,
11 but it doesn't mean that we don't follow the evidentiary rules.

12 So I just don't think this is needed. And I don't
13 want to introduce this document which was the solution or the
14 resolution proposed by counsel in the spreadsheet because I
15 think that takes it even farther into hearsay. I don't want to
16 introduce this document.

17 And so it's unfortunate that the questioning, you
18 know, plaintiffs' questions didn't just ask these questions
19 instead of relying on the Mylan documents, but that's where we
20 are. That's the testimony we have.

21 So I think this is going to be in already. I don't
22 think you need to get into this with this witness through a
23 Mylan document.

24 MR. STANOCH: Real quick, Your Honor.

25 THE COURT: That's the concern I have. Yes, go

1 ahead, David.

2 MR. STANOCH: Thank you.

3 This is the witness we'd get it in, Your Honor.
4 We've heard before, you know, and I don't mean this in any
5 pejorative sense, we've heard for weeks now about you'll have
6 another Teva quality person to talk about something. This is
7 the Teva quality person. He was noticed on two different pages
8 of topics about test results and testing and such, and more
9 topics below about the extent of nitrosamine contamination, the
10 use of solvents, the tetrazole ring, Teva's evaluation and
11 knowledge of the risk of the creation of nitrosamines. So as
12 to Teva, this is the witness we are getting it in.

13 And, Your Honor, if you look through this transcript,
14 you'll see, this is part of the setup, right, that Mr. Binsol
15 is agreeing that the steps identified here in terms of the
16 sodium nitrite exposes -- the hydrochloric acid can form nitric
17 acid, et cetera. He confirms all of those chemistry testing,
18 risk formation, and evaluation and knowledge issues, and then I
19 used that in the ensuing question about it.

20 So, again, I think the questioning in general is
21 appropriate. And if Ms. Lockard is saying the introduction of
22 the document was the issue, I thought the issue was it wasn't
23 being introduced because she wanted it to be said what it is.
24 That's fine. I thought she wanted to make clear that it's a
25 different document than the one prior.

1 But if this is -- if this Teva witness is not the
2 one, the one who's the 30(b)(6), the quality person to talk
3 about this, we don't have any -- we don't have any Teva person.
4 And I don't think that's an appropriate basis to keep out this
5 testimony.

6 THE COURT: All right.

7 MS. LOCKARD: I've never said he's not the right
8 witness to talk about quality issues. He is. But the
9 questioning, you're asking this witness a question about the
10 Mylan Q & A, not about the ZHP issue.

11 And what I'm hearing now, I've heard you say
12 "notice," it shows notice a couple of times. And that really
13 gives me pause with respect to the prejudice and 403 and
14 misleading objections. Because if you're trying to use this to
15 suggest that Mr. Binsol had notice of these issues before the
16 ZHP issue, that's a misuse of this document. Because the
17 document you're questioning about, you're saying here's what it
18 says, and he says yes. I mean, you're basically going through
19 the document and he's saying yes, that's what it says, that's
20 what the discussion with Mylan was. That's what it says.

21 But there's no acknowledgment or concession that he
22 knew or that Teva knew all of these things before the ZHP issue
23 came to light.

24 So for notice, it has no relevance. It doesn't show
25 notice. All it shows is that they knew that this was the root

1 cause because ZHP told them that was the root cause, and FDA
2 confirmed it all after the fact.

3 MR. STANOCH: If I misspoke, that was not my
4 intention.

5 THE COURT: Go ahead, David, quickly.

6 MR. STANOCH: I'm sorry. Thank you, Judge.

7 If I misspoke, that wasn't my intention. The point
8 is that Teva is going to agree that even after the fact
9 quote-unquote that this is how nitrosamine formed, then we're
10 going to show with other information that there was other
11 information. So that's knowledge of how it can form. That's
12 not -- I'm not saying notice, this tipped you off in 2011 or
13 something before the recalls. I'm saying you're agreeing with
14 this knowledge as a fact that this is how nitrosamine can form,
15 right, as a general matter, right?

16 And then later in the deposition I juxtapose that
17 against earlier-in-time documents, including those in Teva's
18 own records, right, which talk about the same thing about
19 nitrosamine formation, right? And I think we're allowed to say
20 Teva acknowledges NDMA can form in manner A, and then compare
21 that to other documents prior in time saying isn't this
22 document in Teva's possession, saying the same thing about how
23 NDMA can form in the manner A, right? And I can put those two
24 things together.

25 I'm not trying to say this tipped off Teva about the

1 potential in the past. This particular document is saying
2 we're establishing the baseline, we're on the same page. NDMA
3 can form under these conditions. Yes. And then use that later
4 to say these documents you had from the past, right, talk about
5 those same conditions. Those are two different things. This
6 is part one of the equation.

7 THE COURT: Well, I'm not sure what the equation is,
8 but I will overrule the objection. I think this is relevant,
9 probative evidence. I know there are hearsay objections, but I
10 can't tell from the exchanges that are at issue on these pages
11 of the transcript that there is a hearsay problem, and we'll
12 allow it.

13 MS. LOCKARD: Understood, Judge.

14 MR. STANOCH: And I think, Judge --

15 THE COURT: I think we're to row -- go ahead. I'm
16 sorry.

17 MR. STANOCH: Oh, I was just going to say I think
18 that would get us -- because this line of questioning goes
19 through from row 11, and the next sort of area of questioning
20 would be row 12, beginning at page 66.

21 MS. LOCKARD: So --

22 THE COURT: So you're saying this gets us through
23 rows 7 through 11?

24 MR. STANOCH: Yes, I think that's right. And, again,
25 I am happy when we -- if I'm wrong, Ms. Lockard can correct me.

1 And in our going through meet-and-confer, I'm certainly happy
2 if there's particular things that we can address and excise
3 from what you just allowed, I'm happy to do that.

4 THE COURT: Go ahead, Victoria.

5 MS. LOCKARD: So I don't necessarily agree with that.
6 I mean, if we just take exhibit -- or take row 8, for example,
7 one of our issues is that this just starts up with the answer
8 and no question.

9 MR. STANOCH: I -- if that was -- I will -- there's
10 no counterdesignation there from Ms. Lockard. I'm happy to add
11 the question back in on page 57, if it was cut out.

12 MS. LOCKARD: Well, yeah. We did have a counter,
13 57:11 to 57:14, if it's brought in.

14 MR. STANOCH: I will agree.

15 THE COURT: All right. So that's in.

16 Anything else, Victoria?

17 MS. LOCKARD: Yeah. I mean, this is -- I guess if
18 we're not dealing with the -- we're going to make -- we are
19 going to make an objection to this document, and there is some
20 uncertainty about how we're going to handle this, because in
21 this particular designation, he's talking -- he's pointing out
22 a specific diagram on the document. And so, you know, we don't
23 believe this document -- this exchange between Mylan and Teva
24 should come in. We do think it's a hearsay document. Mylan is
25 not a party opponent in this trial.

1 And so I think -- I mean, I understand this goes part
2 and parcel with the Mylan discussion, but we're going to have
3 to -- if the document's out, this testimony can't come in,
4 because he's looking -- talking about a diagram that's on the
5 document that won't make any sense to the jury if the document
6 is not in. That's not background information about how this
7 forms.

8 MR. STANOCH: Pending an outcome of objections to
9 exhibits, we may have to revisit certain of these designations.

10 THE COURT: Well, when are those objections to
11 exhibits going to be presented?

12 MS. LOCKARD: I --

13 MR. STANOCH: Frankly --

14 MS. LOCKARD: I emailed Mr. Stanoch over the weekend
15 when I sent Mr. Nudelman's -- or not over the weekend, but when
16 I sent Mr. -- Dr. Nudelman's and I said you need to let me know
17 which exhibits you plan to introduce with these witnesses so
18 that we can hash out any objections we have to them and get
19 them heard by the Court.

20 So we don't have a -- we don't have an exact timeline
21 for that with the Court yet.

22 THE COURT: All right. So -- go ahead, David.

23 MR. STANOCH: I was just going to say, I can't speak
24 for my entire side, Your Honor. There's a lot of moving
25 targets in terms of the PTO. As Your Honor knows, you'll be

1 having a hearing at the end of the week on that, and I know the
2 parties, I assume, would have exhibit lists, but I would agree
3 that I'm not -- I'm personally not sure what the exact timing
4 would be.

5 THE COURT: All right. So my ruling is that this
6 testimony that is covered by row 8 of the spreadsheet, that
7 testimony is subject to an examination...

8 The exhibit used in that examination cannot be used.
9 And if that's the corresponding testimony...

10 THE COURT REPORTER: I'm sorry, Your Honor.

11 (No audio.)

12 (Court reporter interruption.)

13 THE COURT: Row 8 of the spreadsheet... testimony is
14 subject to...

15 (Audio indiscernible.)

16 THE COURT: Yes. The examination that is covered by
17 Teva in row 8 of the spreadsheet, if... then the testimony will
18 not come in.

19 (Court reporter interruption.)

20 THE COURT: Counsel, are you able to hear everything?

21 MR. STANOCH: I could not. I'm having trouble
22 hearing Your Honor.

23 THE COURT: All right. I don't know why that's the
24 case.

25 (Discussion was held off the record.)

1 THE COURT: Let's try one more time. All right.

2 And my ruling is that if the exhibit that is the
3 subject of the testimony that's covered by row 8 of the
4 spreadsheet is excluded, then the corresponding testimony will
5 be excluded.

6 Were you able to hear that?

7 THE COURT REPORTER: Yes, Your Honor.

8 MR. STANOCH: Yes, Your Honor.

9 THE COURT: All right. Victoria?

10 MS. LOCKARD: I could hear. Thank you.

11 THE COURT: All right. Okay.

12 MS. LOCKARD: So I think there was also just, Dave,
13 Mr. Stanoch, I don't think you included the answer at the end
14 of that designation on line 8. So I assume you agree to
15 include that as well. I don't think we countered that because
16 I didn't notice that was cut off.

17 MR. STANOCH: Agreed. Will be added. If it was cut
18 off, it was an accident.

19 THE COURT: All right.

20 MS. LOCKARD: Okay. So that takes us to row 63. And
21 we did have some counters that we designated for this.

22 THE COURT: Yeah. That takes us to row 9.

23 MS. LOCKARD: Excuse me. Row 9, yes.

24 THE COURT: Yeah. Page 63 of the deposition.

25 And you had counters that start at page 61 of the

1 deposition, correct?

2 MS. LOCKARD: Correct. Yes.

3 MR. STANOCH: I'll agree to them.

4 THE COURT: All right. So the counters are agreed
5 to.

6 Does that resolve your objection?

7 MS. LOCKARD: It does. I don't -- I did not have any
8 objections, just the counter. So I think that resolves row 9.

9 THE COURT: Okay. So row 9 is resolved.

10 Let's go to row 10. And this concerns the testimony
11 at page 64, lines 5 to 9. The objection is Rule 403.

12 MS. LOCKARD: Right. This is -- to me, we objected,
13 403. I mean, it is vague, confusing and misleading.

14 I don't know what's meant by available literature.
15 If he's talking about -- I mean this witness was designated on
16 testing and levels. So is he talking about that available
17 literature? If he's talking about other available literature,
18 then I guess it would be personal knowledge and outside the
19 scope.

20 But I think this question is just vague and
21 confusing. And it doesn't provide anything relevant to the
22 process because he says he's not aware.

23 THE COURT: Yeah. David.

24 MR. STANOCH: Your Honor, I think the question is
25 relevant, and, in fact, I just agreed to the counters of the

1 questions and answers both immediately before and immediately
2 after this. The witness was designated on more than just
3 testing. He was also designated on knowledge of the risks of
4 creation of nitrosamines, the risks and knowledge and
5 evaluation of the health risks of nitrosamines and other such
6 topics. He answered the question. He's clearly saying that
7 he's not aware of this particular process, and then I follow-up
8 about patent information, and he has no problem answering that
9 information, all in questions that counsel for the defense have
10 just counterdesignated above in row 9 which we agreed to let
11 in.

12 So I don't think there is anything that falls within
13 Rule 403, and certainly nothing under vagueness or form given
14 that the witness was able to answer it. And in the ensuing
15 questions and answers that have been counterdesignated, he's
16 clarifying information to the best of his knowledge.

17 THE COURT: Yeah. Given the fact that the testimony
18 covered by row 9 of the spreadsheet is coming in, I think that
19 clarifies and makes understandable the question that appears at
20 line 5 of page 64 going through line 19 on page 64. So this
21 covers, in my mind, rows 10 and 11 of the spreadsheet.

22 MR. STANOCH: Understood, Judge.

23 THE COURT: All right. So they'll come in.
24 Objections are overruled.

25 MS. LOCKARD: Okay. And let me just make a

1 clarification point on the record. I think counsel has
2 overstated the topics that this witness was designated on. He
3 wasn't designated on the risk -- the knowledge of the health
4 and safety risks. That was Dr. Nudelman.

5 THE COURT: Okay.

6 MS. LOCKARD: So I don't know that --

7 MR. STANOCH: I don't want to belabor --

8 THE COURT: It doesn't affect my ruling, though.

9 MR. STANOCH: Okay. Yeah. I'll stop.

10 MS. LOCKARD: Okay. So that takes us to row 11.

11 THE COURT: Okay.

12 MR. STANOCH: That was just the answer to the one
13 above it, Ms. Lockard.

14 THE COURT: I think it takes us to row 12.

15 MS. LOCKARD: Yes. Okay. Just making my note here.

16 MR. STANOCH: Thank you.

17 MS. LOCKARD: All right. That takes us to row 12.

18 MR. STANOCH: Agreed.

19 MS. LOCKARD: We had an objection as to the
20 foundation, relevance, and hearsay. This is a discussion --
21 plaintiffs are asking about this patent. It's actually a
22 Chinese patent application.

23 So I know that this was discussed with the ZHP
24 witnesses, and that's a little bit different because it was a
25 document that was within the ZHP witnesses' document production

1 and in their business records. And I understand the line of
2 questioning and the Court's rulings on that there.

3 Here, it's a little bit different. This is a Chinese
4 patent application that counsel has pulled out and is asking
5 Mr. Binsol about this, and we do have objections to this, a
6 number of objections to this. This is not something that is
7 shown that was ever produced by Teva or that was ever seen by
8 Teva or that this witness is aware of. This witness was
9 certainly not identified on issues related to patents. You
10 know, I don't think this document has been authenticated. It
11 is a Chinese patent application that appears to be pulled off
12 of a Google website.

13 And so although to ask ZHP about it, it was in their
14 production, that's one thing. To ask Mr. Binsol about it we
15 think is lacking in relevance, it's prejudicial, and it's
16 hearsay.

17 THE COURT: All right. David.

18 MR. STANOCH: Thank you, Your Honor.

19 First, Ms. Lockard's correct that this is a publicly
20 available version of the same patent which was attached to the
21 ZHP email which Your Honor has heard so much about. And on one
22 level the document fairly goes to the knowledge of
23 N-nitrosamine formation, which is clearly within the topics on
24 which he was noticed.

25 I'm not saying notice at this yet. I'm saying the

1 witness agrees that this document does reflect his and Teva's
2 understanding about the creation of nitrosamines in terms of
3 how it -- what it lays out in terms of valsartan API. That's
4 number one.

5 Number two, Your Honor, the document has a number
6 then of nonhearsay purposes which flow through that.

7 Number one is that it's establishing that there was a
8 notice of a danger. That's not hearsay; that this document was
9 publicly available years prior, years prior to the recalls, and
10 that Teva is acknowledging that what it says is correct in
11 terms of NDMA formation and how -- and the feasibility, by the
12 way, of if you remove the sodium azide, you're not going to get
13 the NDMA, how it's feasible to have valsartan without NDMA
14 formation. They're acknowledging that's correct and that it
15 existed years prior. And then further, the witness
16 acknowledges I wasn't aware of that and Teva wasn't aware of
17 that, because he was the designee on Teva's evaluation and
18 knowledge of the risk of the creation of nitrosamines,
19 including NDMA.

20 So in addition to that, Your Honor, it's also not
21 hearsay because we're not trying -- it's a public record, I
22 might add. And courts often take even judicial notice of
23 patents, patent applications, and prosecution history. But the
24 fact that there's published scientific literature and publicly
25 available information is highly relevant to the defendants'

1 knowledge or the ability and feasibility of understanding a
2 potential defect or a danger in a product. And that's the
3 classic nonhearsay purpose which is allowed.

4 And, again, this witness was designated on these
5 topics, agrees with the NDMA formation discussions, and that
6 this information is the same information, in fact, of what we
7 were talking about a few rows earlier, right, when we were
8 looking at that Q & A and other documents, right, where I asked
9 him, you agree NDMA can form under these conditions? Yes? He
10 says, "Yes." That was sort of knowledge writ large.

11 Now we've linked that up and said, well, here's that
12 same knowledge which you agree shows you how NDMA forms. Here
13 it is in the public sphere years ago, right, and you agree it's
14 the same and you say we didn't know about it. I think that's
15 relevant and probative.

16 MS. LOCKARD: So, first of all, that's a
17 mischaracterization of this document. This witness says that
18 he's responding to the references to the generation of
19 Impurity K. And plaintiffs can argue that, you know, their
20 interpretation of this is that it establishes the presence of
21 NDMA. That's their argument. But this document and this
22 witness talks about the generation of Impurity K in this
23 document. So it does not go to show notice of formation of
24 NDMA.

25 Secondly, it doesn't go to show notice by Teva of

1 anything, because Teva didn't have this document in their
2 materials, unlike ZHP. ZHP had it in their files; Teva didn't.
3 This has never been established with this witness to be a
4 publicly available document. It was a Chinese patent
5 application. And U.S. courts, courts will allow U.S. patents
6 to be presented typically either if they are properly
7 authenticated or if there's a certified version from the patent
8 court or on occasion they will take public notice. But I have
9 not been able to find any evidence of a court in the United
10 States, and we've looked, taking judicial notice of a Chinese
11 patent application off of Google. And even the patent courts
12 in the U.S. don't allow evidence of patents via Google patent.
13 It has to be an official document.

14 So we don't think that -- the fact that this was
15 pulled off of Google and put into ZHP's file without proper
16 authentication, without establishing through this witness that
17 this witness or Teva would have had public access to it is
18 inappropriate.

19 I mean, the bottom line is it's just not relevant to
20 this witness and to Teva. Teva didn't have it. They didn't
21 see it. It doesn't show notice.

22 Plaintiffs like this document, and they're going to
23 have plenty of time to talk about it with ZHP, but it shouldn't
24 come in through Tony Binsol.

25 THE COURT: All right. David, final word on this.

1 MR. STANOCH: Thank you, Your Honor. I'll be very
2 brief.

3 THE COURT: All right.

4 MR. STANOCH: We asked this witness, who again is
5 known -- is the 30(b)(6) on evaluation -- on formations and
6 knowledge -- formation of nitrosamine and knowledge of how
7 nitrosamines can form. And I say: "This patent is saying if
8 you don't use sodium nitrite in the manufacture of the
9 valsartan API, you're not going to get the nitrous acid. And
10 that was one of the components that we agreed could
11 theoretically lead to the formation of NDMA, right?

12 "Answer: Right."

13 And then he goes on, and we go back and forth some
14 more. And then I say, well, did Teva ever search for this
15 document, this publicly available information before?

16 And he says, well, I don't think so.

17 And you'll recall, Your Honor, testimony earlier
18 about does the quality department or anyone at Teva actually do
19 a public search for public information which merely puts folks
20 on notice, a nonhearsay purpose, about the potential danger or
21 the feasibility of a product characteristic and what its
22 effects might be for the formation of NDMA.

23 And I think it's highly relevant and certainly
24 probative, and a jury can infer that there is publicly
25 available information, whether or not -- we're not trying to

1 prove NDMA forms based on this patent alone, right? But the
2 fact that there was out there in the prior art a publicly
3 available document that you could get on the Internet years
4 earlier and Teva never got it, that that certainly goes to the
5 quality and the appropriateness of its quality oversight of
6 ZHP, that it would never even have bothered to even look for
7 something like this, let alone what it says or not; that they
8 never even thought to look for it years ago when it was sitting
9 out there in the ether, which we can argue about what the
10 patent does or does not say about Impurity K or nitroso
11 compounds, but that's a different issue.

12 And this goes to what Teva did or did not do years
13 prior with the information in the public sphere that was
14 available to put them on notice and to warn the public in
15 general about knowledges in the prior art of design defects or
16 potential unreasonable dangers of the product.

17 MS. LOCKARD: See, this is why I objected to the
18 question about available literature, because now they want to
19 shoehorn that response into suggesting that, oh, that Teva has
20 some obligation to look through all the available literature,
21 which means Chinese patent applications, and it's so tenuous
22 and prejudicial at this point that I'm smiling because I can't
23 believe that this is -- that this is the core evidence that
24 they want to rely on.

25 But it's not even a patent, Your Honor. I mean, it's

1 an application in China. It's going to come in through ZHP. I
2 mean, there's -- there's no -- there's no testimony. They
3 didn't set this up with this witness. He didn't set it up with
4 this witness to show that it was publicly available in the
5 appropriate way to authenticate it, to ask this witness, does
6 anybody at Teva do patent searches? Does anybody look at the
7 Chinese patent applications? They didn't set it up in that way
8 and it's therefore not admissible and it's prejudicial.

9 MR. STANOCH: Ten seconds, Your Honor.

10 THE COURT: Ten seconds.

11 MR. STANOCH: I specifically asked the witness,
12 right, who, again, is the corporate witness on Teva's knowledge
13 about the formation of NDMA, I asked him if he's aware of it,
14 if anyone at Teva became aware of this patent and its
15 examination of the nitrosamines. He says I can't -- he says
16 I'm not aware of it. I said, are you aware of anyone else
17 discovering this patent at Teva? So I did ask him about what,
18 if anything, Teva did at the time.

19 Leave it at that.

20 MS. LOCKARD: But under 611(a), it's not even
21 accurate. It's not even a patent. I mean --

22 MR. STANOCH: The witness -- I'm not going -- I'm
23 sorry. I don't want to dicker, Your Honor.

24 THE COURT: Yeah. My initial inclination was to
25 sustain the objection to this line of testimony, which is

1 covered by, correct me if I'm wrong on this, rows 12, 13, and
2 14 of the spreadsheet.

3 MS. LOCKARD: I mean, I guess if he wanted to simply
4 ask, you know, was Teva -- was anybody at Teva aware of the
5 patent and there was a question do you know if ZHP ever
6 disclosed the existence of the patent, and he says I'm not
7 aware, I guess with those -- you know, maybe there could be a
8 compromise with those two questions. But I think that's as far
9 as it should go under these evidentiary rules.

10 THE COURT: See, what I had a problem with, David, is
11 the question at line 18 of page 74 of the transcript where you
12 ask: "Can you think of any reason why Mylan or ZHP would not
13 be able to find this publicly available patent concerning the
14 preparation of valsartan API?"

15 And first I think the question is misleading in terms
16 of you're talking about this patent when we're talking about a
17 patent application. "And can you think of any reason," I just
18 don't think that's a proper question.

19 And it sort of -- that tied up the whole line of
20 inquiry. And so I'm going to sustain the objections that are
21 covered by rows 12 --

22 MR. STANOCH: I would agree to the question and
23 answer you highlighted, Your Honor, to withdraw that.

24 And I'd also, just to correct the record, the
25 document itself, the patent application was granted and

1 published. That's what it says. It's not just a patent,
2 quote, patent application --

3 THE COURT: Okay.

4 MR. STANOCH: -- in Chinese.

5 First of all, it's all in English, all translated,
6 and it was granted and published. So I'm just stating that for
7 the record, Judge.

8 THE COURT: All right.

9 MR. STANOCH: So it's a patent. It's not a patent
10 application.

11 MS. LOCKARD: It's not a patent. I will get a
12 certificate, a declaration from my patent colleague who looked
13 at this. It is not a patent.

14 MR. STANOCH: Well --

15 MS. LOCKARD: So it's misleading, and it's
16 misrepresenting what this is. And that's the underlying
17 problem with it.

18 MR. STANOCH: I think we're getting far afield --

19 THE COURT: Well, I'm going to sustain the objections
20 for the testimony covered by rows 12 and 13 and 14 of the
21 spreadsheet.

22 And I think that takes us to row 15.

23 MS. LOCKARD: Right. And, Your Honor, I think just
24 the first -- that row 15 also deals with the patent. The first
25 part is the answer to the question that you sustained the

1 objection on, and then there's a new question.

2 THE COURT: What line are we on, Victoria?

3 MS. LOCKARD: That would be -- it's page 75, line 1
4 to 11.

5 THE COURT: Okay.

6 Yeah. That should be out.

7 MS. LOCKARD: Then that takes us to 16, row 16.

8 MR. STANOCH: I'm sorry. I didn't understand the
9 answer to the prior one. 75:6 to 76:11, right, that's
10 different, that's asking a different question.

11 It was -- in fact, it was your contingent counter.

12 MS. LOCKARD: Right. Only if it came in. But --

13 MR. STANOCH: Given this, I'll say that I'd ask for
14 it to come in then.

15 MS. LOCKARD: I will agree to this line 6 to 11.

16 THE COURT: On page 75?

17 MS. LOCKARD: Correct.

18 MR. STANOCH: Thank you.

19 THE COURT: All right. That's it.

20 MS. LOCKARD: Okay. Can you -- can you edit out the
21 word "Mylan"? Is that -- are we going to fight about that?

22 MR. STANOCH: Well, we'll -- we'll deal with it.

23 MS. LOCKARD: Okay.

24 Okay. So row 16, page 79.

25 THE COURT: That's what I have.

1 MS. LOCKARD: Yeah. So this is questioning about the
2 EPA technical fact sheet, and I do -- you know, I do have a
3 relevance and a prejudice objection here. This is an
4 Environmental Protection Agency document. It really -- the
5 reason they're bringing it in relates to some of the
6 carcinogenicity issues. So I had made a note, "this is subject
7 to the GC ruling," because they're bringing this out to say
8 that EPA calls it a potent carcinogen. So we really object to
9 that entire question and answer.

10 THE COURT: So this covers the testimony from
11 page 79, line 24 through page 85, line 7.

12 MS. LOCKARD: It's such a long designation. That's
13 why I'm pausing because there's a lot of information in here
14 that I think is subject to the GC ruling. With that aside,
15 there is a lot of irrelevant testimony that is in this
16 designation that derives from this EPA technical fact sheet.

17 So I just don't think that, aside from -- if general
18 causation is out, as plaintiffs say, then I just don't think
19 there's any relevance left to this document whatsoever. And
20 that's why we objected to the entire designation.

21 THE COURT: David.

22 MS. LOCKARD: Plaintiff --

23 MR. STANOCH: In terms of quote-unquote general
24 causation, yes, I mean, part of this, you know, may talk about,
25 I mean, literally defining what NDMA is, as a semi-volatile

1 compound with carcinogenic potential. Sure, you know, we'll
2 see what Judge Bumb says on Thursday about that. But as to the
3 rest of it, I think it's certainly relative -- relevant, Your
4 Honor, right, that it's a document predating all the recalls,
5 talking about the nature of NDMA.

6 And I think it's important to note, too, that the EPA
7 is talking about nitrosamines in water, and that's important
8 because ZHP in 2017 stumbled upon NDMA in connection with
9 testing its wastewater in the manufacture of valsartan, right?
10 So I think the discussion about how NDMA in water and
11 wastewater and things of that nature is all part and parcel of
12 the overall story. And this is showing, you know, Teva's
13 notice and knowledge of at least part of those facts which are
14 one of the reasons that were identified ultimately as being an
15 issue giving rise to the NDMA formation of the valsartan API
16 manufactured by ZHP.

17 THE COURT: I guess the concern I have here, and
18 maybe you can help me with it, David, is there was no mention
19 of pharmaceuticals in this article that you're using for the
20 examination of this witness.

21 MR. STANOCH: I don't -- I don't think, Your Honor,
22 that a document has to say specifically that NDMA can form in
23 the manufacture of a pharmaceutical drug to be relevant. It
24 can say that in manufacturing, industrial and other processes,
25 right, the chemistry, the underlying chemistry formation,

1 chemical formation of NDMA could arise when you're processing
2 things using aqueous solutions, i.e., water, which in the NDMA,
3 one of the root causes identified and what actually happened
4 was that there was ZHP testing its valsartan manufacturing
5 process wastewater and found NDMA.

6 And I think that the fact that all -- that the EPA is
7 acknowledging a variety of processes, right, industrial uses
8 and processing facilities, right, that the chemical reactions
9 happening there could result in NDMA forming, I think that's
10 probative of whether it could form in this manufacturing
11 process even if the word "pharmaceutical drug" does not appear
12 in the article.

13 THE COURT: All right.

14 MS. LOCKARD: Well, we obviously don't think it's
15 relevant for that reason. You know, no one disputes that NDMA
16 was a compound that existed prior to it being discovered. I
17 don't think that's at issue. The issue in the case is whether
18 or not the manufacturers knew or the industry knew that it
19 could form in pharmaceuticals. And this doesn't say that. And
20 so I think it's misleading to the jury to suggest that this
21 presents notice of something that it doesn't give notice of.

22 MR. STANOCH: Well, ten seconds, Your Honor.

23 THE COURT: Yes.

24 MR. STANOCH: This document predating the recalls
25 talks about in a variety of processes that chemical reactions

1 can occur to lead to the formation of NDMA, specifically in
2 byproduct wastewater. And then these questions culminate in
3 then, hey, did Teva ever ask ZHP whether ZHP considered the use
4 of nitrous acid in the manufacture of valsartan that could lead
5 to the creation of NDMA, just like this EPA article is talking
6 about, and he says I'm not aware of it.

7 MS. LOCKARD: But the article is talking about
8 pesticide manufacturing plants, you know, rubber tire makers
9 and, you know, fish processing. So --

10 MR. STANOCH: Right. If it can happen in these dozen
11 other things, I can argue to the jury, Judge, I submit, that
12 it's reasonable for a sophisticated global pharmaceutical
13 manufacturer to exercise its quality cGMP oversight of its
14 supplier and say, hey, in your manufacturing processes, just
15 like it can happen in all these other 15 different things, are
16 you keeping tabs of this. And they never even asked the
17 question. And then that ended up being one of the identified
18 root causes for the contamination of NDMA of valsartan made by
19 ZHP. And Teva never even asked the question.

20 THE COURT: Right. Yeah. I'm persuaded that this
21 line of inquiry is appropriate and the objection is overruled.

22 MS. LOCKARD: Okay.

23 THE COURT: And that should take us through row 17
24 and now take us to row 18.

25 MR. STANOCH: I think so.

1 THE COURT: And that's the testimony that starts on
2 line 5 of page 91.

3 MS. LOCKARD: Okay. I'm getting there.

4 MR. STANOCH: Yes, Your Honor. I think this line of
5 questioning -- I mean, we can see it. I think this line of
6 questioning on this document will go through line 22, 96:4.
7 I'm not trying to preempt Ms. Lockard's objections.

8 THE COURT: No, no.

9 MR. STANOCH: I'm just trying to say the next five or
10 six I think are very related.

11 THE COURT: Yeah.

12 MS. LOCKARD: Yeah. That's what I was looking at to
13 see.

14 So --

15 THE COURT: So this would take us -- I'm sorry to
16 interrupt, Victoria -- take us from row 18 through row 22.

17 MS. LOCKARD: I think that's right, at least.

18 THE COURT: Okay. At least. So let's cover that.

19 MS. LOCKARD: Okay. Right. So I think this is --
20 we've made objections to these articles similarly as we have
21 before to the scientific literature that plaintiffs have used
22 to question our fact witnesses. We do believe there is a
23 hearsay objection there; that it doesn't fall within the
24 learned treatise exception because it hasn't been established
25 as being reliable through an expert, and it's not being used

1 with an expert. So we think that this is an inappropriate use
2 of the literature.

3 We also have made the objection based on relevance
4 and prejudice, but importantly, this 602,
5 lack-of-personal-knowledge and outside-the-scope objection is
6 important because this witness obviously was not here or
7 identified to talk about the state of the scientific literature
8 and whether NDMA had been noted in the literature prior to the
9 discovery.

10 He was identified to come in and speak about the
11 actual testing results that Teva undertook and what was going
12 on with their testing program and how they, you know, were
13 testing for impurities. It wasn't a witness who was identified
14 to come in and talk about, you know, all of the literature in
15 the public referencing NDMA's.

16 So that is the gist of our objection on this section
17 and these multiple articles.

18 THE COURT: All right. David.

19 MR. STANOCH: Thank you, Judge.

20 The questioning is about an article from 2012
21 produced from Teva's files with a custodial date of 2011 about
22 the overall impact of the regulatory requirements for genotoxic
23 impurities of the drug development process. And it goes on at
24 length to talk about the testing of pharmaceutical products for
25 genotoxic impurities. And Mr. Binsol, aside from being

1 designated on topics about knowledge and evaluation of risk of
2 the creation of nitrosamines, was designated on any number of
3 topics regarding testing and testing used in conjunction from a
4 quality standpoint, including testing limits used for the
5 product. And this article specifically talks about FDA
6 guidance on genotoxic and carcinogenic impurities and the
7 limits or lack of limits for such impurities like nitrosamines.

8 And this was -- this, more than some other articles
9 that maybe we talked about earlier today or definitely versus
10 the patent, this was in Teva's possession in 2011, right, and
11 it was sent around by emails in 2014 within Teva about it. It
12 certainly is probative of Teva's knowledge prior to the recalls
13 about the impact of the regulatory requirements of testing and
14 potential formation for genotoxic impurities during
15 pharmaceutical drug process development.

16 And the witness had no issue answering the questions
17 and went through the questions. And, Your Honor, I believe
18 that Mr. Karlsson the other week, you did let in one article
19 because it was, you know, it was within Teva's possession. I
20 won't say -- you -- I won't want to argue about it, but you did
21 let in an article. This is very similar to that article and
22 the articles that you've let in I believe with the ZHP
23 witnesses, right?

24 And this is not something like the patent which I put
25 in front of him, which he hadn't seen, or Teva didn't Bates

1 stamp. This was their records. It certainly shows the
2 nonhearsay purpose that they were on notice about all of this
3 information about the testing of genotoxic impurities,
4 including nitrosamines.

5 THE COURT: Yeah. I'll overrule the objection to
6 this line of inquiry. I think it is relevant for purposes of
7 showing notice and will allow it.

8 And I think that takes us now to row 23.

9 MR. STANOCH: I believe you're right, Your Honor.
10 But, again, I'm not trying to cut off Ms. Lockard, but I think
11 that's right.

12 MS. LOCKARD: Yeah. I think that's generally right.
13 I think I had one more note.

14 THE COURT: All right.

15 MS. LOCKARD: Just let me check that and see if this
16 resolves it.

17 Actually, I think it does. So I think you're right.

18 THE COURT: And the inquiry on page 98, starting at
19 line 11, which is addressed in row 23 of the spreadsheet, seems
20 to be dealing with another article.

21 MS. LOCKARD: Right. I think there were two. Let me
22 just get there.

23 One of the issues, aside from the article, this
24 designation is getting into the sourcing of API from Hetero for
25 losartan. This -- I mean, if he wants to -- under your

1 rationale, if he wants to ask about the article and the date of
2 the article and the title of the article, I think that's okay.
3 But then when we get to line 3 of page 99 and it's asking about
4 one of the authors is someone affiliated with Hetero, who is a
5 codefendant in valsartan and the losartan litigation, I think
6 this part should come out, Your Honor, based on relevance and
7 confusion.

8 David, do you have any objection to that?

9 MR. STANOCH: I'm trying to get to where you're
10 looking at.

11 MS. LOCKARD: Sorry. It would be --

12 THE COURT: Page 99.

13 MS. LOCKARD: -- page 99, line 3. Line 3.

14 MR. STANOCH: Well, a moment, Your Honor. I just
15 want to get there.

16 I -- I think it -- I think I'd leave in the question
17 about that the authors were affiliated with Hetero, and he
18 answers "yes." I don't see an issue with that. It sounds like
19 Ms. Lockard's issue is that Teva sourced some API from Hetero.

20 Yeah, I'd be okay withdrawing 99:8 through 100:8,
21 which is I guess specific questions about Hetero losartan.

22 So I would agree to withdraw the question beginning
23 at 99:8 through the answer of 100:8.

24 MS. LOCKARD: So that would take care of row 24 and
25 part of row 23.

1 MR. STANOCH: Uh-huh.

2 MS. LOCKARD: But you want to leave in the question
3 about "among the authors of this article is someone who is
4 affiliated with Hetero Drugs." Why do we need that? That's --
5 they haven't -- they're not going to have heard about Hetero.
6 That's 99:3 through 7.

7 MR. STANOCH: Fine.

8 THE COURT: All right. They're out, too.

9 MR. STANOCH: 99:3 through 100:8, I will withdraw,
10 Your Honor.

11 THE COURT: Okay.

12 MR. STANOCH: I'm sorry we could not have done this
13 prior to today. We're both working hard, Judge Vanaskie.

14 THE COURT: I know you're working very hard.

15 MR. STANOCH: I apologize we couldn't have done this,
16 but --

17 MS. LOCKARD: But we have resolved a lot, a lot. So,
18 Your Honor, you should know that. We have resolved a lot of
19 things.

20 THE COURT: And I greatly appreciate that. Thank
21 you.

22 So where are we at now?

23 MS. LOCKARD: Row -- well, row 25, page 100, line 16,
24 and I think he's still talking about the article.

25 MR. STANOCH: Uh-huh. Yes.

1 MS. LOCKARD: Let me get to the bottom.

2 I think under the Court's prior rationale, I think
3 that probably comes in. So I think that flows from the ruling
4 on the articles. So we'll accept that.

5 THE COURT: All right.

6 MS. LOCKARD: And I think that would include -- with
7 that coming in, we would agree to...

8 THE COURT: It seems to me --

9 MS. LOCKARD: Oh, I see. The answer is designated,
10 but I don't think the answer made it on our sheet, because I
11 didn't really have an objection to the answer.

12 MR. STANOCH: I see. Okay. So 104:22 is a question,
13 right. We're okay with the question. And, Ms. Lockard, we'll
14 try to mute out "Mylan" or something if you're okay with that.

15 MS. LOCKARD: Wait. No. I'm not there yet. Sorry.

16 MR. STANOCH: Oh, I'm sorry. I thought you were
17 there.

18 MS. LOCKARD: Sorry, Mr. Stanoch.

19 I was looking at -- so we had just talked about row
20 25, which is 100:16 to 104:9.

21 MR. STANOCH: I'm with you.

22 MS. LOCKARD: Okay. And then the question -- that's
23 the end of the question -- and then the answer is at 104:13 to
24 17, and I didn't see that on the dispute chart. But I think
25 I -- I just confirmed that you had actually designated that, so

1 I think that's in.

2 THE COURT: Okay.

3 MR. STANOCH: Right.

4 THE COURT: Because that was not designated. That
5 was not on the spreadsheet provided to me.

6 MR. STANOCH: Right.

7 MS. LOCKARD: Yeah. Okay. So I think we got that
8 resolved on our own.

9 THE COURT: Okay.

10 MS. LOCKARD: So then I'm on 104:22, sorry,
11 Mr. Stanoch, I cut you off.

12 MR. STANOCH: No, please. I was just saying at
13 104:22 at the end of that question we can try to mute out
14 "Mylan." I'm fine, or "Mylan." And then I think the rest of
15 that would come in, that ensuing question and then the next
16 line, the answer, but take a look.

17 THE COURT: So why not simply eliminate lines 19
18 through 21 of page 104?

19 MR. STANOCH: I agree.

20 THE COURT: So that comes out. Are you with us,
21 Victoria?

22 MS. LOCKARD: Yes, I'm with you.

23 THE COURT: All right.

24 MS. LOCKARD: But then the reference to Mylan at
25 line 24, you would need to edit out.

1 MR. STANOCH: Yeah. We'll just -- we'll stop at
2 "assessment by ZHP." Is that acceptable?

3 MS. LOCKARD: Yes.

4 THE COURT: All right.

5 MS. LOCKARD: I mean, we had objections here which I
6 don't -- which I don't -- I'm not withdrawing. But I know
7 where Judge Vanaskie is going on this one, so...

8 THE COURT: Yeah. I mean, I would allow it as long
9 as you could edit out the reference to "Mylan."

10 MS. LOCKARD: Right. So 105, so this was the answer
11 at 105:13, to 105:19, so I think that goes along --

12 MR. STANOCH: Yes.

13 THE COURT: Yes, it does.

14 MS. LOCKARD: -- with your ruling.

15 Row 28, we jump to page 134.

16 MR. STANOCH: I'll withdraw row 28 which begins at
17 134:18.

18 MS. LOCKARD: Yeah. That was the Jerusalem issue.

19 Okay. So that's out.

20 Right, Judge? Are you with us on that one?

21 THE COURT: I'm with you on that. So the testimony
22 covered by row 28 starting at page 134, line 18 through 136,
23 line 7 is out.

24 That takes us to row 29, which jumps ahead to
25 page 171.

1 MS. LOCKARD: Okay.

2 MR. STANOCH: And you know what, Your Honor, to help
3 us move along, I may even withdraw this one, too.

4 MS. LOCKARD: Please do, because it's totally
5 confusing and not relevant.

6 (Laughter.)

7 I may be hurting my case. I don't -- I mean, we're
8 going to have to spend time explaining it if so, and...

9 THE COURT: So you want to withdraw the testimony
10 covered by row 29?

11 MR. STANOCH: Yes.

12 THE COURT: And the counters as well?

13 MS. LOCKARD: Yes, we will withdraw those.

14 THE COURT: Okay. All right. Row 30, page 184.

15 MS. LOCKARD: Just give me a moment, Your Honor.

16 THE COURT: Yeah. I have to read through it myself.

17 MS. LOCKARD: So, the issue here is that at the time
18 of Mr. Binsol's deposition testimony, there was some
19 uncertainty about the nature of the testing and actually what
20 testing was done. And the documents that he was shown, he
21 couldn't answer the question from the documents that he was
22 shown, but the answer was in other documents. And I objected
23 on this because I think it gets very confusing throughout this.
24 But, you know, I think I'll withdraw the objection here because
25 I think, in fairness, the witness was disclosed on testing, so

1 I think Mr. Stanoch is probably going to be allowed to ask him
2 this question -- these questions. So --

3 THE COURT: So what is covered here? Rows?

4 MS. LOCKARD: So row 30, and then, yeah, it's just --
5 that just goes to the designation at row 30.

6 THE COURT: Okay.

7 MS. LOCKARD: So we'll withdraw, so that will come
8 in.

9 THE COURT: That will come in.

10 MR. STANOCH: Tell you what, Your Honor, in the
11 spirit of compromise, Ms. Lockard withdrew the objection to row
12 30, I'll withdraw the designation at row 31.

13 (Laughter.)

14 MS. LOCKARD: Okay.

15 MR. STANOCH: We can split the baby ourselves,
16 Counsel.

17 THE COURT: Good. All right.

18 So we're at row 32 now. Now, there is a counter at
19 row 31. Page 198, lines 1 to 16.

20 MR. STANOCH: I think that was just an answer to a
21 question. And if the question is coming out, the answer I
22 think would come out, too.

23 THE COURT: Yeah. It is just an answer. Okay.

24 MS. LOCKARD: Yeah. So we'll withdraw it.

25 THE COURT: So that's out as well.

1 So everything in row 31 is out.

2 We're now to row 32.

3 MR. STANOCH: Yes, sir. Page 200, line 12.

4 The objection is only to the beginning of this
5 question. At page 200, 12 through 14, if I'm reading
6 Ms. Lockard's objections correctly, then I'm fine beginning the
7 question at page 200:15. I just usually try not to do that
8 deliberately to cut things off, but if that's the objection,
9 I'm willing to agree to that.

10 MS. LOCKARD: Okay. We'll accept that. So that was
11 the only objection to that row.

12 MR. STANOCH: Oh, okay.

13 I am making the note.

14 THE COURT: Okay. So row 32 is covered?

15 MR. STANOCH: Yes, sir. We are trimming so that row
16 32, page 200, lines 12 through 14 will be removed, but the
17 remainder will remain in of that designation.

18 THE COURT: Okay. Very well.

19 MS. LOCKARD: So that takes us to row 33.

20 THE COURT: All right. I know we do not have too
21 much more to go, but I'd like to take a 15-minute break at this
22 time. All right.

23 MS. LOCKARD: Works for me.

24 MR. STANOCH: Yes, sir.

25 THE COURT: Okay. Thanks.

1 MR. STANOCH: Thank you.

2 (Recess was taken at 2:32 p.m. until 2:46 p.m.)

3 THE COURT: Okay. Are we all here?

4 MR. STANOCH: Yes, Your Honor.

5 THE COURT: Victoria, are you with us?

6 MS. LOCKARD: I am. I am, Your Honor. I'm here.

7 THE COURT: Okay. And, John, you're all set to go?

8 THE COURT REPORTER: Yes. Thank you, Your Honor.

9 THE COURT: So let me pull the spreadsheet back up.
10 And what row are we up to now?

11 MS. LOCKARD: Thirty-four. No. Thirty-three.

12 THE COURT: Thirty-three. That's what I thought.

13 MS. LOCKARD: But --

14 THE COURT: This covers -- go ahead.

15 MR. STANOCH: There's only 42 rows, Judge.

16 THE COURT: I know. No. I knew we didn't have much
17 longer to go, and I'm sorry, but I did have to take a call.

18 MR. STANOCH: No. Please, please.

19 MS. LOCKARD: But I think the same issue that we're
20 going to discuss applies to rows 33, 34, and 35.

21 THE COURT: Okay.

22 MS. LOCKARD: Okay. So this issue, this line of
23 questioning relates to an email transaction that is between
24 Dr. Nudelman, who's a toxicologist for Teva, he sits in Israel,
25 and a woman who is at one of the Teva facilities in Japan.

1 The Teva facility in Japan did not have anything to
2 do with the valsartan that was produced for the U.S. market.
3 And so Judge Bumb has ruled that references and testimony and
4 evidence related to Teva's other facilities that were producing
5 valsartan for other markets around the world is not relevant to
6 this case.

7 So my objection to these three rows relates to that
8 because this is questioning of Mr. Binsol, Mr. Binsol, who is a
9 30(b)(6) witness who was identified to talk about testing and
10 knowledge of nitrosamine levels for the drug at issue for the
11 U.S. market. He did not -- he was not identified and was not
12 prepared to talk about issues related to every single Teva
13 facility, just the U.S. market.

14 This line of questioning is highly irrelevant,
15 prejudicial. And I'll tell you the reasons are because it's
16 talking about the evaluation of a peak at a Japanese facility
17 that did not produce the U.S. product or the product at issue.
18 It was a peak that plaintiffs like the language where it says
19 "unknown peak." It started off as an unknown peak, but it was
20 identified as acetamide. It became a known peak. And
21 acetamide is not at issue in formation of NDMA and NDEA in this
22 case. It's a different impurity. And this is regarding what
23 toxicological investigation was done. And so this witness is
24 not here to talk about toxicological investigations. So it's
25 just irrelevant.

1 I mean, the only thing it's probative of is to show
2 that back during this time period, that there was an unknown
3 peak that was initially called an unknown peak, it was
4 determined to be acetamide, and it was sent to the global
5 toxicologists to evaluate the toxicology for that acetamide
6 impurity. Well, none of that has anything to do with unknown
7 peaks determined to be nitrosamines in the U.S. product.

8 So we think all of those lines of questioning and
9 this document are irrelevant, prejudicial. This witness lacks
10 personal knowledge, it's outside the scope, and it should come
11 out.

12 THE COURT: All right. David.

13 MR. STANOCH: Your Honor, this is the ZHP global --
14 I'm sorry. Your Honor, this is a Teva global quality employee,
15 a 30(b)(6) on testing and testing methods. This is showing in
16 2016 Teva's knowledge about how it -- what it should do and the
17 steps it should take from a cGMP process and quality oversight
18 process; that it should be -- and has and does have global
19 processes that should be followed to properly identify and
20 characterize peaks.

21 That this one turned out to be something else, that's
22 not the point. We're not trying to say oh, aha, Teva Japan
23 called the NDMA first. This is showing what the Teva global
24 process for quality is and should have been with respect to
25 valsartan; that in this instance they were looking -- testing a

1 product, looked at a product, found something unknown and went
2 through a process and knew how to do so in 2016. And we are
3 comparing that to what did not happen with the valsartan, which
4 we argued that they were not doing the same process, the same
5 testing and proper characterization of the chemical composition
6 of the valsartan they were purchasing.

7 And I asked him about processes in place at the time,
8 about identifying unknown peaks in the testing that would be
9 done and tie that back into in the questioning ZHP, in terms of
10 at this time in 2016 was there a process to ensure conveyance
11 of information from one Teva site to others that might be
12 sourcing API from the same supplier, in this case ZHP. And go
13 on about: Are you aware of the processes that were in place at
14 Teva at the time for communicating with API suppliers about
15 issues regarding the API being tested? And this was the way to
16 establish that with this quality-and-testing witness.

17 MS. LOCKARD: But this witness was not identified to
18 talk about global issues at Teva facilities in Japan or
19 anywhere else other than the U.S., first of all; he was not.

20 And these questions are asking him questions about,
21 well, what follow-up was done in this instance? Well, he
22 doesn't know. He doesn't -- he doesn't oversee Teva's Japan
23 facility. He wasn't identified to talk about those issues. He
24 wasn't prepared to talk about those issues. And so there's
25 this line of questions which is, do you know what follow-up

1 occurred at Teva with respect to the identification of this
2 unknown peak, and he says I do not. Well, that's prejudicial,
3 because it makes it seem as if he's supposed to know when he's
4 not. It's not his role. He doesn't have personal knowledge of
5 that. And the whole ordeal of it -- I mean, Judge Schneider
6 specifically carved out issues related to what was going on at
7 other Teva facilities and non-U.S. product in the discovery
8 order. I mean, we didn't get into all of this in the
9 discovery. We didn't have witnesses talk about it because it's
10 not relevant.

11 So then to ask a witness in the 30(b)(6) deposition,
12 well, what was the follow-up going on in Teva when they found
13 an unknown peak, it's very misleading and prejudicial to
14 suggest that he doesn't know or no one at Teva knows. But
15 furthermore, it doesn't connect the dots to what's happening or
16 what happened in the nitrosamine U.S. issue.

17 I mean, they're trying to say that, okay, well, they
18 did identify the unknown peak because of acetamide and then
19 they asked for a toxicology evaluation and that's somehow
20 relevant to their argument here saying that we didn't do the
21 right thing because nobody identified the unknown peak. I
22 don't see how that connects at all.

23 I mean, if that's the case, then we should be able to
24 bring out each and every single time that any Teva facility in
25 the world identified an unknown peak, found out what it was,

1 did a proper toxicology examination. And, I mean, this is just
2 getting into like, you know, 404 character evidence. Because
3 then we're, all of a sudden, arguing about all these other
4 times where we did the right thing.

5 So it just really -- we're going to have to take a
6 lot of time to sort of explain this if we get into this. It
7 just doesn't connect.

8 THE COURT: Yeah, I agree.

9 MR. STANOCH: May I?

10 THE COURT: I've heard -- go ahead, David.

11 MR. STANOCH: Just for the record, Your Honor, very
12 briefly. Magistrate Judge -- we went over this the other week.
13 I disagree with the characterization of Judge Schneider's
14 discovery order. It allowed discovery regarding testing that
15 could identify a nitrosamine-type issue, right? This is the
16 same type of testing, right, that would do that. And this
17 isn't just any old product that Teva was making anywhere in the
18 world. This is about valsartan. This is about testing of
19 valsartan and finding during the spectrometry testing an
20 unknown peak and what happened. This is not saying some other,
21 you know, some generic aspirin in South America, you know, you
22 were looking for something else. This is exactly what we were
23 allowed to get into.

24 Because, again, the ZHP email when it was talking
25 about irbesartan, that's not excluded because it talks about

1 irbesartan initially, right, because the same methods and
2 issues should have led to the discovery of the NDMA in
3 valsartan. And this is showing that here as well.

4 MS. LOCKARD: Judge Schneider's ruling only applied
5 to non-U.S., to the extent it related to the nitrosamine
6 impurities. And this doesn't. It's a different impurity. It
7 doesn't say anywhere in these documents anything about
8 nitrosamine that he's been asking about.

9 MR. STANOCH: It --

10 MS. LOCKARD: So --

11 THE COURT: Yeah. I -- you know, I can understand
12 how you can connect it, David, but I think it's not close
13 enough to bring this into this trial, and we'll sustain the
14 objection and strike the testimony that is covered by I guess
15 it's rows 33, 34, and 35 of the spreadsheet.

16 MS. LOCKARD: Okay. So that takes us to page 210,
17 row 36.

18 So we object on the basis of relevance, prejudice,
19 403 and hearsay.

20 So these -- this email is a -- or the document is a
21 Mylan document, and it includes emails from someone at Matrix.
22 So for the first objection we do believe that this is a hearsay
23 document, notwithstanding, you know, whether it's contained
24 within a business record, but we're talking about discussions
25 with Matrix.

1 But on the larger issue, it is a document that's
2 talking about Mylan product that is not the same product at
3 issue here.

4 Mylan's product was a combination valsartan product.
5 It was a valsartan amlodipine combination drug, and that is
6 what these emails and these documents relate to. It does not
7 relate to -- it goes to the Mylan issue. It does not relate to
8 the valsartan -- the ZHP valsartan that's at issue in this
9 case.

10 So it's talking about a discussion of a CE method
11 under the European methodology rules. And we agree -- or we
12 argue at least on this piece it also fails to connect the dots
13 sufficient to allow Mr. Binsol to be asked about these
14 documents.

15 THE COURT: All right. David.

16 MR. STANOCH: Thank you, Judge.

17 Number one, the document was produced by Mylan
18 because Matrix is a subsidiary of Mylan. That's what that is.
19 And it's emails between the Mylan/Matrix personnel and Teva
20 personnel, right?

21 So Teva folks are sending and receiving this email
22 and asking questions about it. That's number one.

23 Number two, this is a witness who is designated
24 specifically on testing regarding valsartan. This is about the
25 testing that was being done on a valsartan product, and it goes

1 to the knowledge and capabilities and feasibility of using
2 different testing methods to identify substances, including in
3 this case the azide, which is part of the sodium azide that was
4 part of the chemical reaction here that led to the formation of
5 NDMA.

6 The email goes on and on and back and forth with Teva
7 asking questions about the liquid chromatography and mass
8 spectrometry, LCMS method, being more specific and sensitive to
9 detect impurities at ppm, parts per million levels than HPLC.

10 And I'm sure Your Honor has heard plenty of times in
11 the last month about the testing methods available and known at
12 the time able to detect impurities in drug products. And this
13 is Teva personnel talking in 2011 about using the more specific
14 and sensitive LCMS method, the method that we say and that the
15 FDA later said will detect these things to analyze impurities
16 to the part per million level in a valsartan product.

17 So this is much more specific and tethered to the
18 issues in this case than the arguments we've heard for the last
19 email where we've heard that it was maybe about a different
20 product or a different impurity or something else. This is
21 focused on exactly the topics he was designated on, testing and
22 testing methods, right? And it's talking about the very
23 methods at issue in this case for testing impurities, and it's
24 about valsartan.

25 MS. LOCKARD: I just want to make sure I heard you

1 correctly.

2 You're not saying that Matrix is a part of Teva,
3 right?

4 MR. STANOCH: I said that Matrix was a subsidiary of
5 Mylan.

6 MS. LOCKARD: Mylan. Okay. I wanted to make sure I
7 heard you correctly.

8 MR. STANOCH: It was the NDA -- or the ANDA holder.
9 Matrix is under Mylan.

10 MS. LOCKARD: Right. Okay. I just want to make sure
11 that was -- I may have misheard you.

12 MR. STANOCH: No; I said it.

13 MS. LOCKARD: So the issue, though, is none of this
14 testimony talks about the chromatograms. I mean, this is sort
15 of -- it's not -- there's nothing much here that's relevant and
16 compared to the prejudice that it presents and the confusion
17 that it presents. We're sort of introducing this Matrix
18 discussion. It doesn't -- this discussion about, you know, who
19 is this guy, you know, Gili Oshri, you know, there's nothing
20 relevant in this discussion.

21 I understand they want to introduce the document, I
22 guess, because they like something that's in there. But
23 there's nothing in this discussion that's relevant to this
24 case.

25 MR. STANOCH: Ten seconds, Your Honor.

1 THE COURT: Yes. Yes, please. Because I am having
2 trouble finding the relevance here.

3 MR. STANOCH: Sure, Your Honor.

4 Again, in the middle of these designations, right, at
5 page 212, I asked the witness that -- we're talking about
6 testing of valsartan and the methods to test valsartan that
7 could find azide content. And I say: "Isn't it true that
8 sodium azide content [sic] is a component of solvents, such as
9 DMF?"

10 And he answers: "I know sodium azide is used as a
11 quenching agent during the valsartan -- valsartan API
12 manufacturing process," right.

13 So the witness is acknowledging, and I'm not
14 surprised because he was designated on 22 or so topics
15 regarding testing, right, that I'm asking him that in 2011
16 about what testing methods did Teva know existed to get the
17 most specific levels of impurity testing, right. And he's
18 saying, yes, GC-MS, right. And you can find sodium azide,
19 which is one of the catalysts of the NDMA in the valsartan API
20 at issue in this case.

21 And so when they say no one -- when they come in and
22 say that nobody could find it, you wouldn't be able to -- we
23 had to come up with a special test and we had to, you know,
24 subcontract out a lab and we were using HPLC at the time and
25 nobody would use GC-MS at the time, this is Teva saying years

1 earlier, no, using GC-MS you can find things like the very
2 catalyst that can lead to NDMA, and, in fact, we were doing
3 that and quantifying it at very specific levels concerning
4 impurities in valsartan product.

5 THE COURT: Okay. Here's the problem I'm having
6 right now, and maybe it's because I don't have the complete
7 designation. The question and answer that you read starting at
8 line 1 of page 212 is not part of what I reviewed because it
9 wasn't designated as in dispute.

10 So when you read, "And in terms of azide content,
11 isn't it true that sodium azide is a component of certain
12 solvents, such as DMF," that's not in the designations that I
13 have.

14 MS. LOCKARD: But we didn't object to that.

15 THE COURT: So it was --

16 MS. LOCKARD: Excuse me, Your Honor.

17 THE COURT: Okay. That's the problem.

18 MR. STANOCH: I'm sorry.

19 MS. LOCKARD: Yeah. The designation, just for
20 clarity on the record, at page 212, line 1 to 7 which is the
21 question, "In terms of azide content, isn't it true that sodium
22 azide is a component of certain solvents, such as DMF," and he
23 answers, we did not object, because in fairness to
24 Mr. Stanoch's point and yours, that is a fact, I guess, that
25 you're asking him about and he answers it.

1 But my problem is all the back-and-forth about this
2 hearsay email with Matrix and Mylan, which I don't think that
3 he needs that. I think it's hearsay, and he doesn't need that
4 in order to get to the underlying fact of if this is -- azide
5 is a component of DMF.

6 And then there's nothing in the other designations or
7 this one about showing any knowledge that Teva was aware of its
8 knowledge of testing methods to pick up NDMA.

9 So that is an argument they want to make, but that's
10 not in the testimony that's being disputed.

11 MR. STANOCH: Your Honor.

12 THE COURT: Go ahead.

13 MR. STANOCH: You know, given that, if part of this
14 is back-and-forth questioning about Matrix, Mylan, maybe I can
15 limit this to the designation introducing the document, right,
16 just simply this is an email, it is from whatever date, and
17 then -- I'm seeing if I could just withdraw the rest, if Your
18 Honor would give me a moment.

19 THE COURT: Yeah. And I tell you to look
20 specifically at page 212, line 15 to 213, line 8.

21 MR. STANOCH: I will withdraw 212:15 to 213, line 8
22 right now.

23 THE COURT: All right.

24 MR. STANOCH: So then I would only -- I would on the
25 one before that, I'm happy just to introduce the document at

1 210:11 through 16, and then on 211, I would jump to 211:12.
2 It's just basically -- so it's saying this is the document.
3 It's talking about the determination of azide content in
4 valsartan. He says, hold on. I give him time. He says yes.
5 That way I don't get into Matrix, Mylan and a lot of what I'm
6 hearing from Ms. Lockard.

7 MS. LOCKARD: But there's no basis for the document
8 to be introduced through this witness when -- I mean, it's not
9 his document, and it's a hearsay document. And to introduce
10 the document and then just ask the question, well, azide is a
11 component of sodium azide, isn't it, yes, and then move on,
12 that just doesn't follow. I don't think he needs that document
13 with this witness.

14 If there's another witness he can introduce it with,
15 you know, to, you know, provide some context for what it is and
16 authenticate it in a sense, but this is something that came
17 from Mylan's production, not ours. So I would not agree to
18 that proposal.

19 MR. STANOCH: And, Your Honor, the point here is not
20 just the testimony of "sodium azide is a component of certain
21 solvents like DMF," sure, right, but completely divorced from
22 this, you know, part of this is that it was a conversation that
23 Teva was having in 2011, and not to have in there that that
24 conversation was happening in 2011. I think that swings too
25 far the back way, especially I'm trying to address all these

1 other issues with the email and the folks involved.

2 And, again, remember, this is four years ago before
3 we knew what the last trial was going to be.

4 THE COURT: I understand.

5 MR. STANOCH: So in hindsight, I wish I had done this
6 a little differently, but it's 20/20 in that regard.

7 THE COURT: Yeah.

8 MS. LOCKARD: I just don't see that's appropriate
9 under the evidentiary rules to just introduce a document
10 through a witness who has no information about the document,
11 you don't ask him any questions about it, and then you're going
12 to use that to try to authenticate it to get it into evidence.
13 I don't -- that doesn't flow.

14 MR. STANOCH: Well, that's what I'm taking out,
15 because I -- I asked him about the email and who it's with and
16 it's with Gili Oshri, O-S-H-R-I, you know, right, and who the
17 people are and they're at Teva Israel. And then I talk about
18 their Teva Israel email addresses, et cetera. I'm taking all
19 that out because I'm hearing that it's superfluous, but then --

20 MS. LOCKARD: But he's just reading what -- who's on
21 the email address. He's not on the -- he wasn't sent this.

22 MR. STANOCH: He's a 30(b)(6) on testing methods for
23 Mylan, by the way, and ZHP. And this is testing methods being
24 used for valsartan with Mylan.

25 MS. LOCKARD: I mean, but Mylan isn't in this trial,

1 so I still think it's not relevant.

2 (Pause.)

3 THE COURT: Yeah. I've gone back over this. I'm
4 looking at this line of testimony again, and I'm really
5 struggling with it, David.

6 MR. STANOCH: I hear Your Honor saying you're
7 sustaining the objection. I'll --

8 THE COURT: I sustain the objection.

9 MR. STANOCH: I understand Your Honor's ruling.
10 I'm...

11 THE COURT: Yeah. It's sustained.

12 MR. STANOCH: And that would apply to row 36, which
13 is page 210. I had already withdrawn row 37. I think that's
14 right.

15 THE COURT: Yeah. I think that's right.

16 MS. LOCKARD: And row 38.

17 MR. STANOCH: That's a different document.

18 THE COURT: Yes. It's a different document.

19 MS. LOCKARD: Okay. I see. All right. Let's move
20 to that.

21 Okay. All right. So this is a different document,
22 similar objection as to relevance, prejudice, and confusion.
23 This is another one where, you know, we would say they haven't
24 properly connected the dots. And in the email he's being asked
25 about the Bulgarian Teva site, which is not at issue in this

1 case, and there's a discussion asking -- they have an impurity
2 that they've identified, and it will -- the shorthand is MBS
3 and EBS. It's not a nitrosamine. It is an impurity that was
4 detected in the amlodipine valsartan, which is not the drug at
5 issue. That's the combination product. That's not the drug
6 here. And there is a discussion about asking for outside labs
7 or capability for testing the MBS and the EBS.

8 So from our perspective, it offers no probative value
9 because it's not the drug at issue. It's not the facility at
10 issue, and it's not the impurity at issue.

11 And I know that the subject line itself says
12 "genotoxic impurity in amlodipine valsartan," which is very
13 attractive for plaintiffs' case, to suggest, oh, well, there
14 are all these impurities in valsartan. But it is really
15 misleading to put before the jury testimony about this with
16 this witness, because it's not the right product, it's not the
17 right facility, and it's not the right impurity. And so
18 discussions about, well, is there a lab or capability to test
19 this other thing, that is far afield and not connected
20 sufficiently with the dots.

21 THE COURT: David.

22 MR. STANOCH: Your Honor, this is the facility at
23 which Teva conducted testing of the valsartan API and its
24 finished dose after June 2018, right? And so this is the very
25 facility it sent valsartan finished dose or valsartan API from

1 ZHP to be tested, right?

2 And this is an email just a few months before that,
3 right, in April, in May of 2018 in which those personnel, the
4 same personnel who are in just a few months going to test the
5 valsartan at issue here are talking about the technology and
6 ability and feasibility and methods for testing a valsartan
7 product. And it's talking about what can be done, what cannot
8 be done, and also more importantly, there's discussion here
9 about whether they should require additional genotoxic testing
10 from suppliers of valsartan, of a valsartan product.

11 So I think it's relevant. I think it's squarely
12 within the topics of this testing-and-quality witness, and it
13 goes -- he's the designee on testing. And it obviously goes to
14 knowledge both predating the recalls as well as the feasibility
15 of asking suppliers for additional information regarding
16 testing for genotoxic impurities.

17 It doesn't have to -- again, it doesn't have to be
18 the exact NDMA impurity, right? That's not what this is. But
19 this is the very facility that's doing -- that will do the
20 testing two months later and what they're saying about
21 genotoxic impurities and the methods and if it's feasible or
22 not to test for it, all of that is probative and within the
23 scope of the 30(b)(6).

24 THE COURT: I know he was a 30(b)(6) deponent, but
25 I'm having trouble with the testimony that he gave. You have

1 him scroll through the email, but then you ask him: "You
2 weren't involved in the effort here regarding the potential
3 genotoxic impurities in valsartan amlodipine finished product
4 in April of 2018, right?

5 "No, I wasn't."

6 MR. STANOCH: Right.

7 THE COURT: Which predates your arrival.

8 MR. STANOCH: That's right. He --

9 THE COURT: And then you asked him about the
10 outcomes, and he says I don't know the specifics or actually
11 the outcome.

12 MR. STANOCH: Yes, Your Honor. And I think in a
13 30(b)(6) context, just because he came on to Teva after the
14 recalls, right, everything is outside his personal knowledge,
15 right? Because he wasn't there, right? That's number one. I
16 didn't make him the 30(b)(6); they did. They said here's our
17 guy to talk about testing, you know, 22 or so testing items,
18 right? So I'm asking him what he, he knows, or Teva knows,
19 frankly, on testing, and he doesn't -- and he doesn't know, and
20 doesn't know what the outcome is. And that fact alone I think
21 is probative and relevant in terms of -- go ahead. Go ahead,
22 Ms. Lockard.

23 MS. LOCKARD: But he was -- he was identified as a
24 30(b)(6) on testing issues related to nitrosamines. This is a
25 testing question and email about testing of totally different

1 impurities, MBS and EBS.

2 So we properly prepared him to talk about testing
3 capabilities and what was available both equipment-wise and
4 validated test methodologies for nitrosamines. So he was
5 prepared on that. But he wasn't prepared on these, you know,
6 issues that are totally extraneous about some email about
7 testing for something totally different.

8 MR. STANOCH: And it also talks about, Your Honor,
9 about the ICH M7 guidelines and what the testing that requires
10 generally for genotoxic impurities, not just about the one
11 specific one in this email. And it talks about the testing
12 methods that are appropriate to analyze genotoxic impurities,
13 right, the testing methods that they say two months earlier
14 they should use for genotoxic impurities.

15 MS. LOCKARD: That's not in the testimony.

16 THE COURT: Yeah. I didn't see it in the testimony.
17 It might be in the email. I don't know. I don't have the
18 email.

19 I'm going to sustain the objection covered by row 38.

20 And row 39, I think, as well.

21 So are we at row 40?

22 MS. LOCKARD: We are at row 40. And this row kind of
23 continues --

24 MR. STANOCH: I'm sorry to cut you off, Ms. Lockard.
25 It's just row 39 at page 218, Your Honor?

1 THE COURT: Yeah, 218.

2 MR. STANOCH: I shift gears and I'm asking him about
3 his fluency and what he speaks.

4 THE COURT: Oh, yes, yes.

5 MR. STANOCH: Right. This is just setting up the
6 foundation for the next question, right, because the next
7 question is the final two rows. It's an email in part in
8 Hebrew, right?

9 THE COURT: Right.

10 MR. STANOCH: So I was asking him really his own
11 facilities with other languages and especially Hebrew because
12 it's going to come up. And, you know, Ms. Lockard likes to say
13 what's attractive or not or sexy for a plaintiff's case, but
14 you know, the fact that he says he runs something through, you
15 know, Google translation if he has to, if that's how Teva's
16 quality 30(b)(6) on testing designee is handling dealing with
17 quality issues when talking with his Israeli colleagues, I
18 think that's something the jury can hear. I don't mean to be
19 flip about it. I think it's both foundational for the next --
20 the final two rows because the email is in Hebrew. And if he's
21 saying, you know what, if I see some other language, I just use
22 Google, you know, I think a jury can infer what they like from
23 that.

24 THE COURT: Yeah. And I misspoke. You know, we were
25 covering row 38.

1 MR. STANOCH: I understand.

2 THE COURT: I had not gotten to row 39.

3 MS. LOCKARD: Yeah. And I agree the language issue
4 is a different -- a new issue.

5 But he hasn't -- if there was a question that said,
6 oh, this document is in Hebrew, did you translate it via Google
7 and he said yes, that's different. He doesn't say that. He's
8 asked, Do you speak French? Yes. Do you speak Hebrew? I
9 don't. Well, what do you -- you know, do you ever get emails
10 from colleagues in Hebrew? And he says not directly addressed
11 to me in Hebrew. There may be trailing emails that, you know,
12 someone forwards to me.

13 So on one hand as to row 39, the answer isn't even
14 included there, where he's basically explaining no, if it's
15 sent to me, it's not in Hebrew usually, it's only if I'm just
16 copied.

17 But overall, it's not -- there's no correlation
18 because there's no document in Hebrew where he said, oh, I
19 couldn't read this in Hebrew so I had to Google Translate it.
20 It's kind of drawing -- it's a big -- a big analytical leap to
21 suggest that oh, well, then any document that he was copied on
22 in Hebrew he had to Google Translate it. So I just think it's
23 a diversion and it's not relevant.

24 MR. STANOCH: It's a global company, Your Honor.
25 There's lots of emails you're seeing in lots of languages. I

1 was just trying to set up a foundation when we get to documents
2 in other languages, because it's going to occur -- it occurred
3 to me and it might occur to other laypeople, oh, my gosh, how
4 are you doing with these complex, technical quality issues when
5 you have people speaking dozens of different languages around
6 the world, and he explains what that is. He talks about what
7 happens, what he does, about official translations. He answers
8 whether there's a policy about it. You know, I'm not going to
9 belabor it.

10 THE COURT: Yeah.

11 MR. STANOCH: But I don't -- I don't really see what
12 the --

13 THE COURT: I'll overrule the objection to the lines
14 of questioning on page 218 starting at line 18 and continuing
15 to 219 at line 7.

16 So all of that comes in.

17 MS. LOCKARD: So understood, Your Honor. So we would
18 ask that -- oh, okay. So did I hear you say you would include
19 the answer at 219, 4 to 7?

20 THE COURT: Yeah. That has to come in.

21 MS. LOCKARD: Okay.

22 MR. STANOCH: No objection.

23 MS. LOCKARD: Okay.

24 And then I think that would apply to the next row,
25 219:22 to 228. That's where he really brings in the Google

1 Translate.

2 THE COURT: Yeah. It would apply to that as well.

3 That takes us through line 9 of -- whoops. I'm lost
4 now.

5 MR. STANOCH: I think lines 41 and 42, Judge.

6 THE COURT: Yeah.

7 MS. LOCKARD: Rows, yeah.

8 THE COURT: Rows 41 and 42 of the spreadsheet.

9 MR. STANOCH: Yes, sir.

10 THE COURT: And row 41 deals with the testimony
11 starting at line 12 of page 221 and going to 224, line 9.

12 MS. LOCKARD: Okay. Let me get reoriented here.

13 THE COURT: Yep.

14 (Pause.)

15 MS. LOCKARD: Give me just one second, and I might be
16 able to resolve it.

17 THE COURT: Uh-huh. Okay.

18 MR. STANOCH: I would give her two seconds then, Your
19 Honor.

20 MS. LOCKARD: Yeah. I'm trying to pull up the
21 transcript, because I think this was -- this was an issue that
22 was ruled upon by Judge Bumb related to the Bogoslavski email.

23 (Court reporter clarification.)

24 MS. LOCKARD: I'm sorry. Bogoslavski. It's spelled
25 B-O-G-O-S-L-A-V-S-K-I.

1 MR. STANOCH: I'm not holding you to that, Counsel.
2 I just didn't see any reference to that in the spreadsheet,
3 so...

4 MS. LOCKARD: I know. I thought I included -- that's
5 why I'm taking so long. I thought I had made a note on the
6 spreadsheet, but maybe when I put it to you I didn't include
7 that reference to the MIL.

8 MR. STANOCH: Again, I'm not seeking to preclude you.
9 I understand.

10 MS. LOCKARD: Let me say this: If this was addressed
11 by Judge -- let me pull up -- I'm having a problem with my
12 equipment pulling up that.

13 If it was ruled out by Judge Bumb and if we believe
14 that it was, then I would continue my objection. If it wasn't,
15 then I think I can withdraw the objection here.

16 MR. STANOCH: I think she said, again, I'm not
17 putting words in your mouth, if this was up, I thought she said
18 something along the lines of this was a jury question. But,
19 again, I'm -- because it's a 2017 email, and I think that's
20 what I recall from July.

21 MS. LOCKARD: Okay. Let's do this, I'm emailing
22 somebody whose name will remain nameless, but he's on this call
23 right now saying "pull this up for me."

24 Let's -- let's -- can we just agree that we'll do
25 what Judge Bumb said. And if there's any dispute, we have to

1 talk about the one other remaining issue.

2 THE COURT: Correct.

3 MS. LOCKARD: And if this needs to be addressed by
4 Judge Vanaskie, then we can bring that up again.

5 But I want to take a look at the Judge's ruling to
6 make sure because -- if that's okay with you, Judge.

7 THE COURT: Yeah.

8 MS. LOCKARD: And then we can just report on our
9 agreement. And then that would apply to the last two.

10 THE COURT: That's fine with me.

11 So we'll report back by Thursday. Now on row 42.

12 MR. STANOCH: Same. Same thing, I think, Judge.

13 THE COURT: Right? Okay.

14 MR. STANOCH: I think so. If Ms. Lockard agrees.

15 MS. LOCKARD: Yes. 41 and 42. Yeah. Okay. So
16 we'll do that. So that resolves everything except for those
17 two remaining issues.

18 THE COURT: Yeah. I've got still at issue rows 5 and
19 6 and rows 41 and 42.

20 MR. STANOCH: I agree.

21 THE COURT: All right.

22 MS. LOCKARD: Yes. I agree.

23 THE COURT: Okay. Great. Is that it for today then?

24 MS. LOCKARD: I think that's it for today, unless you
25 had any further thoughts on the pretrial order. I believe the

1 parties, we're about to do a meet-and-confer, plaintiffs and
2 defendants, on the pretrial order at 3:30.

3 THE COURT: Okay.

4 MS. LOCKARD: So if there's anything you want to
5 impart on us, we can share with the rest of the group.

6 THE COURT: I don't have anything to impart on you at
7 this time.

8 MS. LOCKARD: Okay.

9 THE COURT: And I do anticipate being there Thursday
10 for the case management conference being conducted by Judge
11 Bumb. But I don't have anything. But if I have anything by
12 then, I'll certainly let you know.

13 MS. LOCKARD: Okay. That sounds good. I just wanted
14 to make sure.

15 THE COURT: All right.

16 MS. LOCKARD: Okay. Appreciate it. Thank you, Your
17 Honor.

18 THE COURT: Thank you all very much. Yes. Bye-bye.

19 MS. LOCKARD: Thank you.

20 MR. STANOCH: Thank you, Judge.

21 THE COURT: Thanks, John.

22 THE COURT REPORTER: Yes, Your Honor. Thank you.

23 (Proceedings concluded at 3:31 p.m.)

24 - - - - -
25 **FEDERAL OFFICIAL COURT REPORTER'S CERTIFICATE**
- - - - -

1 I certify that the foregoing is a correct transcript
2 from the record of proceedings in the above-entitled matter.
3
4

5 /S/John J. Kurz, RDR-RMR-CRR-CRC

October 9, 2024

6 Court Reporter/Transcriber
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MR. STANOCH: [145] MS. LOCKARD: [148] THE COURT REPORTER: [4] 28/10 29/7 59/8 85/22 THE COURT: [177] / /S/John [1] 86/5 0 08101 [1] 1/8 1 10 [2] 30/10 31/21 100 [1] 52/23 10001 [1] 2/7 10022 [1] 2/20 100:16 [1] 53/20 100:8 [3] 51/20 51/23 52/9 104 [1] 54/18 104:13 [1] 53/23 104:22 [3] 53/12 54/10 54/13 104:9 [1] 53/20 105 [1] 55/10 105:13 [1] 55/11 105:19 [1] 55/11 11 [8] 11/7 25/19 25/23 31/21 32/10 42/4 42/15 50/19 1100 [1] 1/15 12 [10] 25/20 32/14 32/17 40/1 40/21 41/20 58/3 58/5 58/16 82/11 128 [1] 2/6 13 [2] 40/1 41/20 134 [2] 55/15 55/22 134:18 [1] 55/17 136 [1] 55/22 14 [5] 2/3 40/2 41/20 58/5 58/16 1440 [1] 2/10 15 [4] 41/22 41/24 46/15 71/20 15-minute [1] 58/21 1515 [1] 1/15 16 [6] 42/7 42/7 42/24 52/23 57/19 72/1 17 [2] 46/23 53/24 171 [1] 55/25 18 [5] 40/11 46/24 47/16 55/22 81/14 184 [1] 56/14 19 [2] 31/20 54/17 19102 [1] 1/15 198 [1] 57/19 1:00 [1] 1/9 1:00 p.m [1] 3/3 1:19-md-02875-RMB-SAK K [1] 1/4 2 20 [1] 73/6 20/20 [1] 73/6	200 [4] 4/22 58/3 58/5 58/16 20005 [1] 2/11 20016 [1] 2/3 200:15 [1] 58/7 2011 [7] 24/12 48/21 49/10 67/13 69/15 72/23 72/24 2012 [1] 48/20 2014 [1] 49/11 2016 [3] 61/16 62/2 62/10 2017 [2] 44/8 83/19 2018 [3] 75/24 76/3 77/4 2024 [2] 1/9 86/5 21 [1] 54/18 210 [2] 65/16 74/13 210:11 [1] 72/1 211 [1] 72/1 211:12 [1] 72/1 212 [4] 69/5 70/8 70/20 71/20 212:15 [1] 71/21 213 [2] 71/20 71/21 218 [3] 78/25 79/1 81/14 219 [2] 81/15 81/19 219:22 [1] 81/25 22 [4] 47/6 47/16 69/14 77/17 221 [1] 82/11 224 [1] 82/11 228 [1] 81/25 23 [4] 5/18 50/8 50/19 51/25 24 [3] 43/11 51/24 54/25 25 [2] 52/23 53/20 2500 [1] 2/15 28 [3] 55/15 55/16 55/22 29 [2] 55/24 56/10 2:32 [1] 59/2 2:46 [1] 59/2 3 30 [22] 7/3 7/3 11/24 11/24 13/4 13/4 23/2 37/5 56/14 57/4 57/5 57/12 60/9 61/15 63/11 73/22 76/23 76/24 77/13 77/16 77/24 79/16 30305 [1] 2/16 31 [3] 57/12 57/19 58/1 32 [4] 57/18 58/2 58/14 58/16 33 [3] 58/19 59/20 65/15 3333 [1] 2/15 34 [2] 59/20 65/15 35 [2] 59/20 65/15 36 [2] 65/17 74/12 37 [1] 74/13 38 [3] 74/16 78/19 79/25 39 [4] 78/20 78/25 80/2 80/13 3:30 [1] 85/2 3:31 p.m [1] 85/23 4 40 [2] 78/21 78/22 403 [6] 9/17 23/13 30/11	30/13 31/13 65/19 404 [1] 64/2 41 [9] 5/16 10/19 10/20 10/22 82/5 82/8 82/10 84/15 84/19 42 [6] 59/15 82/5 82/8 84/11 84/15 84/19 42-128 [1] 2/6 43 [1] 17/16 48 [1] 17/16 4th [1] 1/8 5 56 [1] 18/8 57 [1] 26/11 576-7094 [1] 1/22 57:11 [1] 26/13 57:14 [1] 26/13 6 601 [1] 2/19 602 [1] 48/4 61 [1] 29/25 611 [2] 8/25 39/20 63 [2] 29/20 29/24 64 [3] 30/11 31/20 31/20 66 [1] 25/20 7 701 [1] 1/19 70130 [1] 1/19 7094 [1] 1/22 74 [1] 40/11 75 [2] 42/3 42/16 75:6 [1] 42/9 76:11 [1] 42/9 79 [2] 42/24 43/11 8 85 [1] 43/11 856 [1] 1/22 9 91 [1] 47/2 96:4 [1] 47/6 98 [1] 50/18 99 [3] 51/3 51/12 51/13 99:3 [2] 52/6 52/9 99:8 [2] 51/20 51/23 A ability [2] 35/1 76/6 able [13] 3/4 16/1 19/16 19/17 28/20 29/6 31/14 36/9 40/13 63/23 67/12 69/22 82/16 above [3] 31/10 32/13 86/2 above-entitled [1] 86/2 accept [2] 53/4 58/10 acceptable [1] 55/2 access [1] 36/17 accident [1] 29/18 accurate [1] 39/21 acetamide [5] 60/20 60/21 61/4 61/5 63/18 acid [4] 22/16 22/17 37/9	46/4 acidic [1] 21/5 acknowledges [2] 24/20 34/16 acknowledging [4] 34/10 34/14 45/7 69/13 acknowledgment [1] 23/21 Actavis [2] 2/17 2/17 ACTION [1] 1/3 actual [1] 48/11 actually [7] 32/21 37/18 45/3 50/17 53/25 56/19 77/10 add [2] 26/10 34/22 added [1] 29/17 addition [2] 11/6 34/20 additional [2] 76/9 76/15 address [7] 4/14 5/12 13/10 16/12 26/2 72/25 73/21 addressed [4] 50/19 80/10 83/10 84/3 addresses [1] 73/18 adds [1] 14/2 admissibility [1] 7/13 admissible [1] 39/8 affect [1] 32/8 affiliated [3] 51/4 51/17 52/4 affirmatively [1] 10/1 affirmatives [3] 6/22 7/24 8/22 affield [2] 41/18 75/19 after [11] 4/9 4/12 5/4 5/4 5/6 7/8 24/2 24/8 31/2 75/24 77/13 afternoon [1] 3/5 again [24] 7/25 9/3 13/8 15/4 15/12 19/6 19/11 19/18 20/3 22/20 25/24 35/4 37/4 39/12 50/10 64/24 69/4 73/2 74/4 76/17 83/8 83/16 83/19 84/4 against [1] 24/17 Agency [1] 43/4 agent [1] 69/11 ago [6] 11/23 15/4 19/12 35/13 38/8 73/2 agree [24] 11/12 17/24 24/8 26/5 26/14 28/2 29/14 30/3 35/9 35/12 35/13 40/22 42/15 51/22 53/7 54/19 58/9 64/8 66/11 72/17 80/3 83/24 84/20 84/22 agreeable [1] 10/22 agreed [7] 11/1 29/17 30/4 30/25 31/10 32/18 37/10 agreeing [2] 22/15 24/13 agreement [2] 19/19 84/9 agrees [3] 34/1 35/5 84/14 aha [1] 61/22 ahead [15] 3/14 3/20 9/11	14/7 22/1 24/5 25/15 26/4 27/22 55/24 59/14 64/10 71/12 77/21 77/21 aided [1] 1/24 ALEXANDRE [1] 2/19 all [99] allow [6] 25/12 36/5 36/12 50/7 55/8 66/13 allowed [6] 24/19 26/3 35/3 57/1 64/14 64/23 alone [3] 38/1 38/7 77/20 along [4] 15/25 55/11 56/3 83/18 already [2] 21/21 74/13 also [14] 2/22 3/18 15/23 19/4 20/7 29/12 31/3 34/20 40/24 41/24 48/3 66/12 76/8 78/8 although [1] 33/13 am [10] 4/12 6/18 7/6 9/3 9/3 25/25 58/13 59/6 59/6 69/1 America [1] 64/21 amlodipine [4] 66/5 75/4 75/12 77/3 among [1] 52/3 analytical [1] 80/20 analyze [2] 67/15 78/12 ANDA [1] 68/8 announce [1] 5/25 another [5] 13/3 22/6 50/20 72/14 74/23 answer [28] 10/23 12/19 12/20 20/21 26/7 29/13 31/14 32/12 37/12 40/23 41/25 42/9 43/9 51/23 53/9 53/10 53/11 53/23 54/16 55/10 56/21 56/22 57/20 57/21 57/23 70/7 80/13 81/19 answered [1] 31/6 answering [2] 31/8 49/16 answers [8] 15/24 31/1 31/15 51/18 69/10 70/23 70/25 81/7 anticipate [1] 85/9 anticipated [1] 16/10 any [23] 6/24 10/2 15/22 22/4 23/3 23/3 27/5 27/18 30/7 36/9 40/12 40/17 43/19 49/2 51/8 63/24 64/17 71/7 73/11 80/21 83/2 83/25 84/25 anybody [3] 39/6 39/6 40/4 anyone [3] 37/18 39/14 39/16 anything [21] 6/20 10/17 11/21 12/9 12/10 16/14 16/15 20/9 20/17 26/16 30/21 31/12 36/1 39/18 60/1 61/6 65/7 85/4 85/6 85/11 85/11 anyway [1] 16/2 anywhere [3] 62/19 64/17 65/7 apart [1] 16/20
--	--	---	---	---

A API [22] 11/7 11/9 11/11 11/22 11/25 12/11 12/24 15/18 20/10 34/3 37/9 40/14 44/15 50/24 51/19 62/12 62/14 62/15 69/11 69/19 75/23 75/25 apologize [1] 52/15 appear [1] 45/11 appearing [1] 5/16 appears [3] 18/12 31/19 33/11 application [10] 32/22 33/4 33/11 36/5 36/11 39/1 40/17 40/25 41/2 41/10 applications [3] 34/23 38/21 39/7 applied [1] 65/4 applies [2] 17/22 59/20 apply [6] 11/20 14/15 74/12 81/24 82/2 84/9 appreciate [2] 52/20 85/16 appropriate [7] 19/23 22/21 23/4 39/5 46/21 73/8 78/12 appropriateness [1] 38/5 April [2] 76/3 77/4 aqueous [1] 45/2 are [54] 3/4 3/5 4/14 4/22 5/1 6/22 9/13 10/22 13/14 14/14 15/19 19/14 19/18 21/20 22/12 25/5 25/9 25/10 26/18 27/10 28/20 30/4 31/24 32/21 36/6 39/16 40/20 42/2 42/21 44/13 46/15 47/10 52/22 54/20 55/20 58/15 59/3 59/5 59/10 60/15 61/9 62/2 62/13 62/20 66/21 73/17 75/14 76/4 76/5 78/6 78/12 78/21 78/22 81/4 area [1] 25/19 argue [6] 10/1 35/19 38/9 46/11 49/20 66/12 argued [1] 62/4 arguing [1] 64/3 argument [6] 6/17 8/7 19/5 35/21 63/20 71/9 arguments [1] 67/18 arise [1] 45/1 around [3] 49/11 60/5 81/5 ARPS [2] 2/5 2/9 arrival [1] 77/7 art [2] 38/2 38/15 article [16] 44/19 45/12 46/5 46/7 48/20 49/5 49/18 49/21 49/21 50/20 50/23 51/1 51/2 51/2 52/3 52/24 articles [5] 47/20 48/17 49/8 49/22 53/4 arts [1] 8/6 aside [5] 20/13 43/14	43/17 48/25 50/23 ask [17] 18/3 21/18 33/13 33/14 39/5 39/17 40/4 40/12 42/13 46/3 51/1 57/1 63/11 72/10 73/11 77/1 81/18 asked [15] 3/14 35/8 37/4 39/11 39/13 46/16 46/19 62/7 63/19 66/13 69/5 73/15 74/24 77/9 80/8 asking [18] 17/4 23/9 32/21 33/4 42/10 51/3 62/20 65/8 66/22 67/7 69/15 70/25 75/1 75/6 76/15 77/18 79/2 79/10 aspirin [1] 64/21 assessment [1] 55/2 Associate's [1] 8/5 assume [2] 28/2 29/14 Atlanta [1] 2/16 attached [1] 33/20 attractive [2] 75/13 79/13 audio [2] 28/11 28/15 authenticate [3] 39/5 72/16 73/12 authenticated [2] 33/10 36/7 authentication [1] 36/16 authors [3] 51/4 51/17 52/3 available [17] 30/14 30/16 30/17 33/20 34/9 34/25 36/4 37/15 37/25 38/3 38/14 38/18 38/20 39/4 40/13 67/11 78/3 Avenue [2] 2/10 2/19 aware [14] 30/22 31/7 33/8 34/16 34/16 39/13 39/14 39/16 39/16 40/4 40/7 46/6 62/13 71/7 away [1] 17/3 azide [16] 34/12 67/3 67/3 69/7 69/8 69/10 69/18 70/10 70/11 70/21 70/22 71/4 72/3 72/10 72/11 72/20	baseline [1] 25/2 basic [1] 5/22 basically [3] 23/18 72/2 80/14 basis [6] 8/1 10/13 20/2 23/4 65/18 72/7 Bates [1] 49/25 became [2] 39/14 60/20 because [81] 3/16 3/18 4/11 4/17 6/6 8/19 8/25 9/4 11/19 11/25 12/9 13/2 13/11 14/23 14/25 15/7 16/9 16/20 16/25 17/7 18/22 19/24 20/2 21/14 22/23 23/14 23/16 24/1 25/18 26/20 27/4 29/15 30/22 32/24 34/17 34/21 36/1 38/18 38/22 43/7 43/13 44/8 47/24 48/6 49/19 53/10 54/4 56/4 56/23 56/24 60/8 60/15 63/3 63/9 63/18 63/21 64/2 64/24 64/25 65/1 66/18 68/22 69/1 69/14 70/6 70/8 70/23 73/15 73/19 75/9 75/16 77/13 77/15 79/6 79/11 79/20 80/18 81/2 82/21 83/19 84/6 been [16] 4/23 5/25 9/23 12/8 13/18 15/23 16/1 21/7 31/15 33/10 36/3 36/9 47/24 48/8 61/24 65/8 before [19] 3/2 8/13 8/14 9/25 10/3 15/3 15/5 17/18 22/4 23/15 23/22 24/13 31/1 37/15 47/21 71/25 73/2 75/15 76/2 beginning [4] 25/20 51/22 58/4 58/6 begins [1] 55/16 being [21] 3/20 4/5 8/3 11/13 19/11 19/16 22/23 44/14 45/16 46/17 47/25 47/25 48/25 62/15 66/25 67/8 71/10 73/23 74/24 85/9 85/10 belabor [3] 9/12 32/7 81/9 believe [12] 3/25 17/8 18/7 26/23 38/23 47/22 49/17 49/22 50/9 65/22 83/13 84/25 below [1] 22/9 best [1] 31/16 between [3] 26/23 59/23 66/19 beyond [1] 14/12 bifurcated [1] 15/6 big [2] 80/20 80/20 Binsol [19] 3/11 3/14 4/14 5/13 5/16 6/6 11/23 13/18 16/19 21/6 22/14 23/15 33/5 33/14 36/24 48/25 60/8 60/8 66/13 Binsol's [2] 18/9 56/18	biochemical [1] 8/7 bit [6] 5/2 6/7 6/13 7/6 32/24 33/3 black [1] 20/4 Bogoslavski [2] 82/22 82/24 both [7] 11/25 11/25 31/1 52/13 76/14 78/3 79/19 bothered [1] 38/6 bottom [2] 36/19 53/1 break [1] 58/21 brief [1] 37/2 briefly [1] 64/12 bring [3] 63/24 65/13 84/4 bringing [2] 43/5 43/7 brings [1] 81/25 brought [1] 26/13 Building [1] 1/7 Bulgarian [1] 74/25 bullets [1] 14/9 Bumb [10] 4/1 11/7 11/15 20/8 44/2 60/3 82/22 83/13 83/25 85/11 Bumb's [1] 3/17 business [8] 8/6 12/3 12/6 14/24 16/4 19/1 33/1 65/24 buying [1] 11/25 bye [2] 85/18 85/18 Bye-bye [1] 85/18 byproduct [1] 46/2	carved [1] 63/6 case [20] 11/9 14/15 20/12 28/24 45/17 56/7 60/6 60/22 62/12 63/23 66/9 67/3 67/18 67/23 68/24 69/20 75/1 75/13 79/13 85/10 catalyst [1] 70/2 catalysts [1] 69/19 category [2] 4/15 4/17 causation [2] 43/18 43/24 cause [5] 3/17 13/15 14/13 24/1 24/1 causes [2] 45/3 46/18 CE [1] 66/10 certain [4] 27/9 70/11 70/22 72/20 certainly [14] 7/2 7/14 7/19 9/5 19/15 26/1 31/13 33/9 37/23 38/4 44/3 49/12 50/1 85/12 certificate [2] 41/12 85/24 certified [1] 36/7 certify [1] 86/1 cetera [4] 7/19 7/19 22/17 73/18 cGMP [3] 8/6 46/13 61/17 character [1] 64/2 characteristic [1] 37/21 characterization [2] 62/5 64/13 characterize [2] 19/17 61/20 chart [1] 53/24 check [1] 50/15 chemical [5] 45/1 45/8 45/25 62/5 67/4 chemistry [3] 22/17 44/25 44/25 China [1] 39/1 Chinese [8] 32/22 33/3 33/11 36/4 36/10 38/21 39/7 41/4 choose [1] 9/14 chromatograms [1] 68/14 chromatography [1] 67/7 CIVIL [1] 1/3 clarification [2] 32/1 82/23 clarifies [1] 31/19 clarifying [1] 31/16 clarity [1] 70/20 Class [2] 1/20 2/4 classic [1] 35/3 clear [1] 22/24 clearly [2] 31/6 33/23 Clerk [1] 2/24 clip [1] 16/13 close [1] 65/12 closed [2] 11/14 12/25 Co [5] 1/16 1/20 2/4 2/7 2/11 Co-Lead [3] 1/16 1/20
---	--	---	--	--

C	conjunction [1] 49/3 CONLEE [1] 1/18 connect [4] 63/15 64/7 65/12 66/12 connected [2] 74/24 75/19 connection [1] 44/8 connects [1] 63/22 considered [1] 46/3 contained [3] 12/24 19/1 65/23 contamination [3] 17/10 22/9 46/18 content [5] 69/7 69/8 70/10 70/21 72/3 context [3] 6/22 72/15 77/13 contingent [1] 42/11 continue [1] 83/14 Continued [1] 2/1 continues [1] 78/23 continuing [1] 81/14 conversation [2] 72/22 72/24 convey [1] 4/5 conveyance [1] 62/10 Cooper [1] 1/8 copied [2] 80/16 80/21 core [1] 38/23 corporate [1] 39/12 correct [11] 25/25 30/1 30/2 33/19 34/10 34/14 40/1 40/24 42/17 84/2 86/1 correctly [3] 58/6 68/1 68/7 correlation [1] 80/17 corresponding [2] 28/9 29/4 could [22] 3/19 7/23 7/23 8/21 17/13 20/8 28/21 29/10 37/10 38/3 40/7 45/1 45/9 45/10 45/19 46/4 52/12 55/9 64/15 69/7 69/22 71/17 couldn't [3] 52/15 56/21 80/19 counsel [20] 1/16 1/20 2/4 2/7 2/11 2/16 2/20 3/15 3/23 4/19 4/24 10/11 14/3 21/14 28/20 31/9 32/1 33/4 57/16 83/1 counter [6] 5/1 6/9 26/12 30/8 42/11 57/18 counterdesignate [1] 9/25 counterdesignated [4] 5/20 8/12 31/10 31/15 counterdesignation [1] 26/10 counterdesignations [1] 3/10 countered [1] 29/15 counters [10] 6/23 7/24 8/15 8/16 8/18 29/21 29/25 30/4 30/25 56/12 couple [1] 23/12	course [3] 16/2 16/5 20/10 court [11] 1/1 1/21 27/19 27/21 28/12 28/19 36/8 36/9 82/23 85/24 86/6 Court's [2] 33/2 53/2 Courthouse [1] 1/7 Courtroom [1] 2/23 courts [4] 34/22 36/5 36/5 36/11 cover [1] 47/18 covered [13] 28/6 28/16 29/3 31/18 40/1 40/21 41/20 55/22 56/10 57/3 58/14 65/14 78/19 covering [1] 79/25 covers [4] 17/12 31/21 43/10 59/14 CRC [1] 86/5 creation [8] 13/6 16/21 22/11 31/4 34/2 34/18 46/5 49/2 cross [1] 17/10 cross-contamination [1] 17/10 CRR [1] 86/5 culminate [1] 46/2 cumulative [1] 13/21 custodial [1] 48/21 cut [13] 4/19 4/24 5/22 15/7 15/13 17/13 26/11 29/16 29/17 50/10 54/11 58/8 78/24 cutting [1] 15/12	defer [3] 4/9 4/12 5/5 defining [1] 43/25 definitely [1] 49/9 degree [4] 6/7 7/7 7/8 8/5 deliberately [1] 58/8 department [1] 37/18 deponent [1] 76/24 depose [1] 11/24 deposed [1] 11/23 deposition [11] 1/5 3/6 4/21 4/21 5/16 21/10 24/16 29/24 30/1 56/18 63/11 Deputy [1] 2/23 derives [1] 43/16 design [1] 38/15 designate [1] 10/1 designated [22] 4/23 5/20 7/9 7/24 12/20 13/5 29/21 30/15 31/2 31/3 32/2 32/3 35/4 49/1 49/2 53/9 53/25 54/4 66/23 67/21 69/14 70/9 designating [2] 6/18 6/18 designation [21] 5/18 6/19 12/17 13/10 13/12 15/13 18/12 21/1 21/2 26/21 29/14 43/12 43/16 43/20 50/24 57/5 57/12 58/17 70/7 70/19 71/15 designations [17] 1/5 3/6 3/9 3/19 4/12 4/19 5/20 9/13 10/3 13/1 16/14 17/16 17/17 27/9 69/4 70/12 71/6 designee [4] 8/5 34/17 76/13 79/16 detect [3] 67/9 67/12 67/15 detected [1] 75/4 determination [1] 72/3 determinative [1] 12/9 determined [2] 61/4 61/7 development [2] 48/23 49/15 diagram [2] 26/22 27/4 dicker [1] 39/23 did [31] 3/21 8/11 8/16 10/4 15/7 16/6 16/14 26/12 29/21 30/7 37/14 38/12 38/12 39/17 39/18 46/3 49/18 49/20 59/17 60/1 60/11 60/17 62/3 63/18 64/1 64/4 69/16 70/23 77/16 80/6 81/18 didn't [28] 5/23 8/20 8/23 17/10 20/8 21/18 29/16 35/14 36/1 36/2 36/20 36/20 39/3 39/3 39/7 42/8 49/25 53/11 53/24 59/16 63/8 63/9 63/20 70/14 77/16 78/16 83/2 83/6 different [25] 4/15 4/16 6/5 22/7 22/25 25/5 32/24 33/3 38/11 42/10 42/10 46/15 60/22 65/6 67/2 67/19 67/20 74/17 74/18	74/21 77/25 78/7 80/4 80/7 81/5 differently [1] 73/6 difficult [1] 21/9 dimethylformamide [1] 21/4 directly [1] 80/10 disagree [2] 9/22 64/13 disclose [1] 9/15 disclosed [2] 40/6 56/25 discovered [1] 45/16 discovering [1] 39/17 discovery [6] 48/9 63/7 63/9 64/14 64/14 65/2 discuss [1] 59/20 discussed [1] 32/23 discussion [15] 15/15 21/2 23/20 27/2 28/25 32/20 44/10 66/10 68/18 68/18 68/20 68/23 75/1 75/6 76/8 discussions [5] 3/6 19/6 35/5 65/24 75/18 dispute [6] 3/18 5/15 6/16 53/24 70/9 83/25 disputed [1] 71/10 disputes [1] 45/15 DISTRICT [2] 1/1 1/1 diversion [1] 80/23 divorced [1] 72/21 DMF [6] 21/5 69/9 70/12 70/22 71/5 72/21 document [90] document's [1] 27/3 documents [13] 13/17 21/19 24/17 24/21 25/4 35/8 56/20 56/21 56/22 65/7 66/6 66/14 81/1 does [21] 7/8 10/14 13/10 18/6 18/7 30/6 30/7 34/1 35/23 37/18 38/10 38/10 39/5 39/6 45/11 50/17 55/13 61/18 66/6 66/7 81/7 doesn't [28] 21/11 23/24 30/21 32/8 35/25 36/21 45/19 45/21 47/23 62/22 62/22 62/22 63/4 63/14 63/15 64/7 65/6 65/7 68/18 71/3 72/12 73/13 76/17 76/17 77/19 77/19 77/20 80/7 doing [4] 62/4 70/2 76/19 81/4 done [11] 9/23 52/12 52/15 56/20 60/23 62/9 62/21 66/25 73/5 76/7 76/8 door [1] 12/10 dose [2] 75/24 75/25 dots [4] 63/15 66/12 74/24 75/20 down [4] 4/19 4/24 11/16 17/13 dozen [1] 46/10 dozens [1] 81/5 Dr. [3] 27/16 32/4 59/24
----------	---	--	--	---

D	Environmental [1] 43/4 EPA [6] 43/2 43/8 43/16 44/6 45/6 46/5 equation [2] 25/6 25/7 equipment [2] 78/3 83/12 equipment-wise [1] 78/3 especially [3] 7/1 72/25 79/11 ESQUIRE [9] 1/14 1/18 2/2 2/6 2/10 2/14 2/15 2/19 2/24 essentially [1] 18/17 establish [5] 13/3 13/7 13/17 19/12 62/16 established [3] 21/7 36/3 47/24 establishes [1] 35/20 establishing [4] 20/17 25/2 34/7 36/16 et [4] 7/19 7/19 22/17 73/18 ether [1] 38/9 European [1] 66/11 evaluate [1] 61/5 evaluation [9] 13/5 22/10 22/18 31/5 34/17 37/5 49/1 60/16 63/19 even [23] 3/15 4/19 4/24 5/24 7/11 14/15 18/25 20/13 21/15 24/8 34/22 36/11 38/6 38/6 38/8 38/25 39/20 39/21 45/11 46/16 46/19 56/3 80/13 evening [2] 5/3 5/4 ever [6] 33/7 33/7 37/14 40/5 46/3 80/9 every [2] 60/12 63/24 everybody [1] 5/9 everything [6] 10/22 19/20 28/20 58/1 77/14 84/16 evidence [7] 25/9 36/9 36/12 38/23 60/4 64/2 73/12 evidentiary [3] 21/11 40/9 73/9 exact [3] 27/20 28/3 76/18 exactly [2] 64/22 67/21 examination [7] 10/7 28/7 28/8 28/16 39/15 44/20 64/1 example [2] 12/24 26/6 except [2] 10/22 84/16 exception [1] 47/24 exchange [1] 26/23 exchanges [1] 25/10 excise [1] 26/2 excluded [3] 29/4 29/5 64/25 excuse [3] 3/14 29/23 70/16 exercise [1] 46/13 exhibit [4] 26/6 28/2 28/8 29/2 exhibits [3] 27/9 27/11 27/17	existed [3] 34/15 45/16 69/16 existence [1] 40/6 expert [2] 47/25 48/1 explain [2] 18/24 64/6 explaining [2] 56/8 80/14 explains [1] 81/6 exposes [1] 22/16 extent [3] 17/17 22/9 65/5 extraneous [1] 78/6	F facilities [6] 45/8 59/25 60/4 62/18 63/7 79/11 facility [17] 11/10 11/12 11/14 11/14 12/25 13/24 15/14 60/1 60/13 60/16 62/23 63/24 75/9 75/17 75/22 75/25 76/19 fact [22] 6/21 7/7 12/7 24/2 24/8 24/14 30/25 31/17 34/24 35/6 36/14 38/2 42/11 43/2 43/16 45/6 47/22 70/2 70/24 71/4 77/20 79/14 facts [1] 44/13 fails [1] 66/12 fair [1] 4/5 fairly [1] 33/22 fairness [3] 8/19 56/25 70/23 fall [2] 16/20 47/23 falls [1] 31/12 far [5] 13/9 40/8 41/18 72/25 75/19 farther [1] 21/15 fast [1] 10/5 fast-one [1] 10/5 FDA [3] 24/1 49/5 67/15 feasibility [11] 12/12 15/20 19/16 20/2 20/14 34/11 35/1 37/21 67/1 76/6 76/14 feasible [2] 34/13 76/21 February [1] 10/3 FEDERAL [1] 85/24 feel [1] 13/24 felt [1] 3/16 few [4] 15/1 35/7 76/2 76/4 fight [1] 42/21 file [1] 36/15 files [2] 36/2 48/21 final [3] 36/25 79/7 79/20 finalizing [1] 3/22 find [7] 12/17 36/9 40/13 69/7 69/18 69/22 70/1 finding [2] 64/19 69/2 fine [8] 4/18 15/12 15/14 22/24 52/7 54/14 58/6 84/10 finished [3] 75/24 75/25 77/3 first [14] 5/15 5/17 13/14 16/8 16/10 33/19 35/16 40/15 41/5 41/24 41/24	61/23 62/19 65/22 fish [1] 46/9 five [3] 17/12 17/12 47/9 flip [1] 79/19 FLOM [2] 2/5 2/9 Floor [1] 2/3 flow [2] 34/6 73/13 flows [1] 53/3 fluency [1] 79/3 focus [1] 20/24 focused [3] 12/22 12/23 67/21 focuses [1] 12/21 folks [3] 37/19 66/21 73/1 follow [6] 21/11 31/7 62/21 62/25 63/12 72/12 follow-up [4] 31/7 62/21 62/25 63/12 followed [1] 61/19 follows [1] 3/3 foregoing [1] 86/1 form [15] 14/14 15/17 20/2 22/16 24/11 24/14 24/20 24/23 25/3 31/13 35/9 37/7 44/22 45/10 45/19 formal [2] 6/15 6/25 formation [33] 12/5 13/16 14/11 15/11 15/15 15/20 16/3 16/11 16/21 19/15 19/17 20/1 20/15 20/18 21/3 22/18 24/19 33/23 34/11 34/14 35/5 35/23 37/6 37/11 37/22 39/13 44/15 44/25 45/1 46/1 49/14 60/21 67/4 formations [1] 37/5 formed [3] 12/13 17/5 24/9 forming [1] 45/9 forms [3] 27/7 35/12 38/1 forth [5] 5/1 37/13 67/6 71/1 71/14 forwards [1] 80/12 found [4] 45/5 62/1 63/12 63/25 foundation [7] 13/3 15/9 19/4 20/18 32/20 79/6 81/1 foundational [2] 16/11 79/19 four [5] 15/4 15/22 19/12 59/11 73/2 FOURNIER [1] 2/19 frankly [3] 8/3 27/13 77/19 French [2] 8/6 80/8 front [3] 9/24 12/2 49/25 further [2] 34/15 84/25 furthermore [1] 63/15	70/1 gears [1] 79/2 general [9] 3/17 12/21 15/24 17/4 22/20 24/15 38/15 43/17 43/23 generally [4] 15/11 16/22 50/12 78/10 generation [2] 35/18 35/22 generic [2] 15/19 64/21 generically [1] 12/13 genotoxic [13] 48/22 48/25 49/6 49/14 50/3 75/12 76/9 76/16 76/21 77/3 78/10 78/12 78/14 Georgia [1] 2/16 germane [1] 20/15 gets [5] 11/8 19/2 21/6 25/22 56/23 getting [6] 5/3 22/12 41/18 47/3 50/24 64/2 Gili [2] 68/19 73/16 gist [1] 48/16 give [8] 11/19 16/3 45/21 56/15 71/18 72/4 82/15 82/18 given [4] 31/13 31/17 42/13 71/13 gives [1] 23/13 giving [1] 44/15 global [8] 46/12 61/4 61/13 61/14 61/18 61/23 62/18 80/24 goes [19] 11/13 12/11 14/12 15/15 19/15 25/18 27/1 33/22 37/13 38/4 38/12 48/23 55/11 57/5 66/7 66/25 67/6 76/13 76/13 GOLDENBERG [2] 2/2 2/2 gone [1] 74/3 good [4] 3/5 20/21 57/17 85/13 Google [10] 33/12 36/11 36/12 36/15 79/15 79/22 80/6 80/19 80/22 81/25 gosh [1] 81/3 got [6] 4/19 6/7 7/7 38/4 54/7 84/18 gotten [1] 80/2 grant [1] 10/13 granted [2] 40/25 41/6 Great [1] 84/23 greatly [1] 52/20 GREENBERG [1] 2/14 group [1] 85/5 guess [10] 9/7 26/17 30/18 40/3 40/7 44/17 51/21 65/14 68/22 70/24 guidance [1] 49/6 guidelines [2] 12/5 78/9 guy [2] 68/19 77/17
E	each [1] 63/24 earlier [7] 24/17 35/7 37/17 38/4 49/9 70/1 78/13 EBS [3] 75/3 75/7 78/1 Economic [2] 1/20 2/4 edit [3] 42/20 54/25 55/9 education [1] 8/16 educational [14] 5/22 5/23 6/2 6/8 6/9 7/9 7/10 8/12 8/19 8/21 9/2 9/4 9/6 9/16 effects [1] 37/22 efficient [1] 5/8 effort [2] 4/11 77/2 either [2] 16/12 36/6 eliminate [1] 54/17 ELLIS [1] 2/18 else [8] 10/1 15/23 26/16 39/16 61/21 62/19 64/22 67/20 elsewhere [1] 13/11 email [28] 3/25 4/5 4/8 33/21 59/23 64/24 65/20 66/21 67/6 67/19 71/2 71/16 73/1 73/15 73/18 73/21 74/24 76/2 77/1 77/25 78/6 78/11 78/17 78/18 79/7 79/20 82/22 83/19 emailed [1] 27/14 emailing [1] 83/21 emails [7] 49/11 65/21 66/6 66/19 80/9 80/11 80/25 embarrass [1] 9/1 embraces [1] 20/19 employee [1] 61/14 employees [1] 9/21 enables [1] 17/18 end [4] 28/1 29/13 53/23 54/13 ended [1] 46/17 English [1] 41/5 enough [1] 65/13 ensuing [6] 12/17 13/1 20/3 22/19 31/14 54/15 ensure [1] 62/10 entire [4] 16/18 27/24 43/9 43/20 entitled [1] 86/2				H hadn't [1] 49/25 half [2] 11/23 15/5

H hand [1] 80/13 handle [1] 26/20 handling [1] 79/16 happen [4] 15/7 46/10 46/15 62/3 happened [5] 14/13 18/17 45/3 63/16 64/20 happening [3] 45/9 63/15 72/24 happens [1] 81/7 happy [9] 12/17 13/9 16/16 17/20 25/25 26/1 26/3 26/10 71/25 harass [1] 9/1 hard [2] 52/13 52/14 HARKINS [1] 2/15 has [25] 4/19 4/24 7/24 8/5 18/13 18/17 18/18 23/24 31/8 32/1 33/4 33/10 33/21 34/5 36/3 36/13 38/19 44/22 60/3 61/6 61/18 67/10 73/10 79/15 81/20 hash [1] 27/18 hasn't [2] 47/24 80/5 have [95] haven't [3] 8/3 52/5 74/23 having [7] 28/1 28/21 69/1 70/5 72/23 76/25 83/11 he [91] he'd [1] 17/18 he's [29] 4/18 7/7 23/7 23/19 26/21 26/21 27/4 30/15 30/17 30/22 31/6 31/7 31/15 35/18 39/13 52/24 63/3 63/3 65/8 69/17 73/20 73/21 73/22 74/24 76/13 79/20 80/7 80/14 83/22 health [2] 31/5 32/3 Healthcare [2] 2/8 2/12 hear [8] 3/4 8/8 28/20 29/6 29/10 74/6 79/18 81/18 heard [15] 7/1 7/15 8/3 22/4 22/5 23/11 27/19 33/21 52/5 64/10 67/10 67/18 67/19 67/25 68/7 hearing [8] 3/13 9/16 14/3 23/11 28/1 28/22 72/6 73/19 hearsay [18] 18/22 19/2 19/3 21/8 21/15 25/9 25/11 26/24 32/20 33/16 34/8 34/21 47/23 65/19 65/22 71/2 71/3 72/9 heart [1] 16/2 Hebrew [11] 79/8 79/11 79/20 80/6 80/8 80/10 80/11 80/15 80/18 80/19 80/22 held [3] 3/1 6/24 28/25 help [2] 44/18 56/2 her [2] 11/15 82/18	here [43] 6/18 6/25 8/23 10/5 11/20 12/9 12/9 12/16 13/23 14/11 14/13 16/19 18/24 20/9 20/24 22/15 32/15 33/3 35/12 43/3 43/13 44/17 48/6 55/5 56/17 56/24 57/3 59/3 59/6 60/24 63/20 65/3 66/3 67/4 68/15 69/2 72/19 75/6 76/5 76/8 77/2 82/12 83/15 here's [6] 17/14 21/2 23/17 35/11 70/5 77/16 Hetero [7] 50/24 51/4 51/17 51/19 51/21 52/4 52/5 hey [2] 46/3 46/14 highlighted [1] 40/23 highlighting [1] 7/7 highly [3] 34/25 37/23 60/14 him [25] 7/23 11/24 12/2 16/3 21/8 35/9 39/13 39/17 49/25 57/1 62/7 62/20 69/15 70/25 72/4 73/11 73/15 77/1 77/1 77/9 77/16 77/18 78/2 79/2 79/10 hindsight [1] 73/5 hired [1] 9/19 his [18] 5/16 6/8 7/3 7/9 7/19 9/2 16/20 16/21 17/4 20/3 31/16 34/1 63/4 72/9 77/14 79/3 79/10 79/17 history [1] 34/23 hold [1] 72/4 holder [1] 68/8 holding [1] 83/1 honest [1] 8/3 HONIK [1] 1/14 Honor [74] 3/13 3/20 3/25 4/4 4/5 4/17 6/15 7/4 7/11 7/15 8/17 9/12 11/18 13/2 19/10 19/22 20/22 21/24 22/3 22/13 27/24 27/25 28/10 28/22 29/7 29/8 30/24 33/18 33/21 34/5 34/20 37/1 37/17 38/25 39/9 39/23 40/23 41/23 44/4 44/21 45/22 47/4 49/17 50/9 51/6 51/14 52/10 52/18 56/2 56/15 57/10 59/4 59/6 59/8 61/13 61/14 64/11 67/10 68/25 69/3 70/16 71/11 71/18 72/19 74/6 75/22 77/12 78/8 78/25 80/24 81/17 82/19 85/17 85/22 Honor's [1] 74/9 HONORABLE [3] 1/11 2/24 3/2 HPLC [2] 67/9 69/24 Huahai [4] 2/7 2/8 2/11 2/12 huh [3] 52/1 52/25 82/17 hundred [1] 13/17	hurting [1] 56/7 hydrochloric [1] 22/16 I I'd [5] 40/24 42/13 51/16 51/20 58/21 I'll [14] 18/3 19/8 30/3 32/9 37/1 42/13 50/5 55/16 56/24 57/12 60/15 74/7 81/13 85/12 I'm [107] I've [6] 5/15 23/7 23/11 64/10 74/3 84/18 i.e [1] 45/2 ICH [2] 12/5 78/9 idea [1] 15/4 identification [1] 63/1 identified [17] 22/15 33/9 44/14 45/3 46/17 48/7 48/10 48/13 60/9 60/11 60/20 62/17 62/23 63/21 63/25 75/2 77/23 identify [5] 19/17 61/19 63/18 64/15 67/2 identifying [1] 62/8 immediately [2] 31/1 31/1 impact [2] 48/22 49/13 impart [2] 85/5 85/6 important [4] 10/8 44/6 44/7 48/6 importantly [2] 48/4 76/8 impurities [21] 48/13 48/23 48/25 49/6 49/7 49/14 50/3 65/6 67/9 67/12 67/15 67/23 70/4 75/14 76/16 76/21 77/3 78/1 78/10 78/12 78/14 impurity [14] 35/19 35/22 38/10 60/22 61/6 65/6 67/20 69/17 75/1 75/3 75/10 75/12 75/17 76/18 Impurity K [1] 35/19 inappropriate [2] 36/18 48/1 Inc [7] 2/8 2/8 2/12 2/12 2/17 2/17 2/20 inclination [1] 39/24 inclined [2] 4/10 4/12 include [5] 13/5 29/15 53/6 81/18 83/6 included [3] 29/13 80/14 83/4 includes [2] 21/4 65/21 including [5] 24/17 34/19 49/4 50/4 67/2 inclusive [1] 15/2 inconsistent [1] 6/13 indiscernible [1] 28/15 industrial [2] 44/24 45/7 Industries [1] 2/16 industry [1] 45/18 infer [2] 37/24 79/22 inference [1] 8/4 influenced [1] 10/12	informally [1] 15/6 information [31] 5/21 5/22 5/23 6/8 7/18 8/8 12/12 12/21 13/15 14/21 15/3 17/8 17/18 24/10 24/11 27/6 31/8 31/9 31/16 34/25 35/6 35/6 37/15 37/19 37/25 38/13 43/13 50/3 62/11 73/10 76/15 initial [3] 4/1 5/18 39/24 initially [5] 5/20 8/11 12/7 61/3 65/1 inquiry [4] 40/20 46/21 50/6 50/18 instance [3] 6/3 61/25 62/21 instances [3] 5/24 10/8 10/9 instead [1] 21/19 instructed [2] 3/20 4/18 intended [1] 8/25 intention [2] 24/4 24/7 Internet [1] 38/3 interpretation [1] 35/20 interrupt [1] 47/16 interruption [2] 28/12 28/19 introduce [8] 21/13 21/16 27/17 68/21 71/25 72/9 72/14 73/9 introduced [2] 22/23 72/8 introducing [2] 68/17 71/15 introduction [1] 22/21 investigation [2] 18/14 60/23 investigations [1] 60/24 involved [2] 73/1 77/2 involving [1] 11/9 irbesartan [3] 1/4 64/25 65/1 irrelevant [4] 43/15 60/14 60/25 61/9 isn't [9] 10/9 24/21 64/17 69/7 70/11 70/21 72/11 73/25 80/13 Israel [3] 59/24 73/17 73/18 Israeli [1] 79/17 issue [50] 5/19 6/24 7/20 9/24 14/1 14/11 16/25 18/15 18/18 19/11 22/22 22/22 23/10 23/16 23/22 25/10 38/11 44/15 45/17 45/17 49/16 51/18 51/19 55/18 56/17 59/19 59/22 60/10 60/17 60/21 63/16 64/15 66/1 66/3 66/7 66/8 67/23 68/13 69/20 74/25 75/5 75/9 75/10 75/10 76/5 80/3 80/4 82/21 84/1 84/18 issues [25] 3/17 7/16 15/1 18/21 22/18 23/8 23/15 26/7 33/9 43/6 50/23	60/12 62/15 62/18 62/23 62/24 63/6 65/2 67/18 73/1 77/24 78/6 79/17 81/4 84/17 items [1] 77/17 its [13] 10/14 10/14 12/5 12/6 37/21 38/5 39/14 44/9 45/4 46/13 46/13 71/7 75/23 itself [2] 40/25 75/11 J Japan [5] 59/25 60/1 61/22 62/18 62/22 Japanese [1] 60/16 JERSEY [2] 1/1 1/8 Jerusalem [10] 11/10 11/14 12/25 13/22 13/24 14/1 15/14 16/15 18/14 55/18 JESSICA [1] 2/6 John [5] 1/21 1/22 59/7 85/21 86/5 Judge [37] 3/8 3/17 4/1 5/18 8/13 11/7 11/15 18/7 20/7 24/6 25/13 25/14 31/22 41/7 44/2 46/11 48/19 52/13 55/7 55/20 59/15 60/3 63/5 64/12 64/13 65/4 66/16 82/5 82/22 83/11 83/13 83/25 84/4 84/6 84/12 85/10 85/20 Judge's [1] 84/5 judicial [3] 2/24 34/22 36/10 July [1] 83/20 jump [2] 55/15 72/1 jumped [2] 18/13 18/13 jumping [1] 19/5 jumps [1] 55/24 June [2] 15/1 75/24 June 2018 [1] 75/24 jury [14] 8/4 8/8 9/20 14/2 14/21 17/18 27/5 37/24 45/20 46/11 75/15 79/18 79/22 83/18 jury's [1] 12/11 just [94] juxtapose [1] 24/16 K KANNER [1] 1/18 Karlsson [1] 49/18 keep [3] 10/23 19/23 23/4 keeping [1] 46/16 kind [3] 14/20 78/22 80/20 KIRKLAND [1] 2/18 knew [8] 23/22 23/22 23/25 45/18 45/18 59/16 62/2 73/3 know [101] knowing [1] 12/12 knowledge [41] 7/18 12/12 13/4 13/5 15/20 16/20 16/21 16/25 17/4
---	---	---	---	--

<p>K</p> <p>knowledge... [32] 19/15 20/14 22/11 22/18 24/11 24/14 30/18 31/3 31/4 31/16 32/3 33/22 34/18 35/1 35/10 35/12 37/6 37/6 39/12 44/13 48/5 49/1 49/12 60/10 61/10 61/16 63/4 67/1 71/7 71/8 76/14 77/14</p> <p>knowledges [1] 38/15</p> <p>known [4] 15/22 37/5 60/20 67/11</p> <p>knows [4] 27/25 63/14 77/18 77/18</p> <p>Kugler [1] 2/24</p> <p>Kurz [3] 1/21 1/22 86/5</p> <hr/> <p>L</p> <p>lab [2] 69/24 75/18</p> <p>labs [1] 75/6</p> <p>lack [2] 48/5 49/7</p> <p>lack-of-personal-knowle dge [1] 48/5</p> <p>lacking [1] 33/15</p> <p>lacks [1] 61/9</p> <p>language [3] 60/18 79/21 80/3</p> <p>languages [4] 79/11 80/25 81/2 81/5</p> <p>large [1] 35/10</p> <p>larger [1] 66/1</p> <p>Larry [1] 2/23</p> <p>last [5] 3/13 67/11 67/18 73/3 84/9</p> <p>later [7] 15/2 15/22 17/1 24/16 25/3 67/15 76/20</p> <p>Laughter [3] 4/7 56/6 57/13</p> <p>Law [1] 2/24</p> <p>laypeople [1] 81/3</p> <p>lays [1] 34/3</p> <p>LCMS [2] 67/8 67/14</p> <p>lead [8] 1/16 1/20 2/4 21/3 37/11 46/1 46/4 70/2</p> <p>leap [1] 80/20</p> <p>learned [1] 47/24</p> <p>least [4] 44/13 47/17 47/18 66/12</p> <p>leave [3] 39/19 51/16 52/2</p> <p>led [2] 65/2 67/4</p> <p>left [1] 43/19</p> <p>legal [6] 6/12 6/15 6/17 7/12 8/1 8/23</p> <p>length [1] 48/24</p> <p>let [18] 6/9 9/20 17/25 27/16 31/10 31/25 38/7 49/18 49/21 49/22 50/15 50/21 53/1 59/9 82/12 83/10 83/11 85/12</p> <p>let's [8] 20/25 29/1 30/10 47/18 74/19 83/21 83/24 83/24</p> <p>level [2] 33/22 67/16</p> <p>levels [5] 30/16 60/10 67/9 69/17 70/3</p>	<p>Lexington [1] 2/19</p> <p>LIABILITY [1] 1/5</p> <p>liberal [1] 8/6</p> <p>light [2] 18/18 23/23</p> <p>like [25] 3/16 4/6 6/21 8/4 9/14 10/21 13/25 17/3 17/10 17/19 21/6 36/22 38/7 46/5 46/15 49/7 49/24 51/18 58/21 60/18 64/2 68/22 70/1 72/21 79/22</p> <p>likes [1] 79/12</p> <p>limit [1] 71/15</p> <p>limits [3] 49/4 49/7 49/7</p> <p>line [47] 10/22 11/12 25/18 29/14 31/20 31/20 33/1 36/19 39/25 40/11 40/19 42/2 42/3 42/15 43/11 43/11 46/21 47/2 47/4 47/5 47/6 50/6 50/19 51/3 51/13 51/13 52/23 54/16 54/25 55/22 55/23 58/3 59/22 60/14 62/25 70/8 70/20 71/20 71/20 71/21 74/4 75/11 81/14 81/15 82/3 82/11 82/11</p> <p>line 24 [1] 54/25</p> <p>lines [8] 30/11 54/17 57/19 58/16 61/8 81/13 82/5 83/18</p> <p>linked [1] 35/11</p> <p>liquid [1] 67/7</p> <p>lists [1] 28/2</p> <p>literally [1] 43/25</p> <p>literature [11] 30/14 30/17 30/17 34/24 38/18 38/20 47/21 48/2 48/7 48/8 48/14</p> <p>litigation [2] 1/5 51/5</p> <p>little [6] 5/2 6/13 7/6 32/24 33/3 73/6</p> <p>live [2] 3/20 7/23</p> <p>LLC [5] 1/14 1/18 2/8 2/12 2/17</p> <p>LLP [4] 2/5 2/9 2/14 2/18</p> <p>LOCKARD [18] 2/14 4/6 6/21 14/7 15/13 20/22 22/21 25/25 26/10 32/13 50/10 53/13 57/11 72/6 77/22 78/24 79/12 84/14</p> <p>Lockard's [5] 4/3 33/19 47/7 51/19 58/6</p> <p>long [4] 4/21 43/12 55/8 83/5</p> <p>longer [1] 59/17</p> <p>look [8] 22/13 38/6 38/8 38/20 39/6 54/16 71/19 84/5</p> <p>looked [4] 8/17 36/10 41/12 62/1</p> <p>looking [10] 14/3 19/24 27/4 35/8 47/12 51/10 53/19 61/25 64/22 74/4</p> <p>looks [1] 10/21</p> <p>Loretta [1] 2/24</p> <p>losartan [4] 1/3 50/25 51/5 51/21</p>	<p>lose [1] 16/10</p> <p>Loss [2] 1/20 2/4</p> <p>lost [1] 82/3</p> <p>lot [9] 10/11 27/24 43/13 43/15 52/17 52/17 52/18 64/6 72/5</p> <p>lots [2] 80/25 80/25</p> <p>Louisiana [1] 1/19</p> <p>Ltd [4] 2/8 2/12 2/16 2/21</p> <hr/> <p>M</p> <p>M7 [2] 12/5 78/9</p> <p>MacStravic [1] 2/23</p> <p>made [7] 18/11 43/6 46/18 47/20 48/3 53/10 83/5</p> <p>Magistrate [1] 64/12</p> <p>make [14] 6/17 16/3 22/24 26/18 26/19 27/5 31/25 67/25 68/6 68/10 71/9 77/16 84/6 85/14</p> <p>makers [1] 46/8</p> <p>makes [3] 17/3 31/19 63/3</p> <p>making [3] 32/15 58/13 64/17</p> <p>Malta [1] 11/11</p> <p>management [1] 85/10</p> <p>Manhattan [1] 2/6</p> <p>manner [2] 24/20 24/23</p> <p>manufacture [4] 37/8 44/9 44/23 46/4</p> <p>manufactured [1] 44/16</p> <p>manufacturer [1] 46/13</p> <p>manufacturers [1] 45/18</p> <p>manufacturing [7] 15/18 44/24 45/4 45/10 46/8 46/14 69/12</p> <p>mark [1] 5/17</p> <p>market [4] 1/15 60/2 60/11 60/13</p> <p>markets [1] 60/5</p> <p>MARLENE [1] 2/2</p> <p>mass [1] 67/7</p> <p>MASTER [2] 1/11 3/2</p> <p>materials [1] 36/2</p> <p>Matrix [11] 65/21 65/25 66/18 66/19 68/2 68/4 68/9 68/17 71/2 71/14 72/5</p> <p>matter [2] 24/15 86/2</p> <p>may [9] 8/4 27/9 43/24 56/3 56/7 64/9 68/11 76/3 80/11</p> <p>maybe [11] 15/6 17/6 17/6 20/23 40/7 44/18 49/9 67/19 70/6 71/14 83/6</p> <p>MBS [3] 75/2 75/7 78/1</p> <p>md [1] 1/4</p> <p>MDL [1] 1/16</p> <p>me [36] 3/4 3/15 4/12 7/8 9/24 16/3 17/19 17/25 23/13 25/25 27/16 29/23 30/12 31/25 40/1 44/18 50/15 50/21 53/1 53/8</p>	<p>54/5 56/15 58/23 59/9 70/16 71/18 80/11 80/12 80/15 81/3 82/12 82/15 83/10 83/11 83/23 84/10</p> <p>MEAGHER [2] 2/5 2/9</p> <p>mean [37] 7/1 8/23 14/3 14/6 17/3 18/12 21/9 21/11 22/4 23/18 26/6 26/17 27/1 30/13 30/15 36/19 38/25 39/2 39/21 40/3 43/24 43/25 47/5 50/25 55/5 55/8 56/7 61/1 63/5 63/8 63/17 63/23 64/1 68/14 72/8 73/25 79/18</p> <p>means [1] 38/21</p> <p>meant [1] 30/14</p> <p>mechanical [1] 1/23</p> <p>meet [2] 26/1 85/1</p> <p>mention [1] 44/18</p> <p>mentions [1] 15/23</p> <p>merely [1] 37/19</p> <p>method [4] 66/10 67/8 67/14 67/14</p> <p>methodologies [1] 78/4</p> <p>methodology [1] 66/11</p> <p>methods [15] 61/15 65/1 67/2 67/11 67/22 67/23 69/6 69/16 71/8 73/22 73/23 76/6 76/21 78/12 78/13</p> <p>middle [1] 69/4</p> <p>might [11] 9/23 10/12 12/7 13/11 15/6 34/22 37/22 62/11 78/17 81/3 82/15</p> <p>MIL [2] 11/7 83/7</p> <p>million [2] 67/9 67/16</p> <p>mind [1] 31/21</p> <p>minute [1] 58/21</p> <p>mischaracterization [1] 35/17</p> <p>misheard [1] 68/11</p> <p>misleading [9] 11/6 19/7 23/14 30/13 40/15 41/15 45/20 63/13 75/15</p> <p>misrepresenting [1] 41/16</p> <p>missing [1] 5/1</p> <p>misspoke [3] 24/3 24/7 79/24</p> <p>misuse [1] 23/16</p> <p>Mitchell [1] 1/7</p> <p>moment [3] 51/14 56/15 71/18</p> <p>month [1] 67/11</p> <p>months [5] 15/2 76/2 76/4 76/20 78/13</p> <p>more [19] 5/8 7/4 10/17 13/25 14/23 14/24 15/8 20/23 22/8 29/1 31/2 37/14 49/8 50/13 58/21 67/8 67/13 67/17 76/8</p> <p>most [1] 69/17</p> <p>mouth [1] 83/17</p> <p>move [4] 15/25 56/3 72/11 74/19</p>	<p>moving [1] 27/24</p> <p>Mr [1] 27/16</p> <p>Mr. [36] 3/11 3/12 3/14 3/15 3/15 3/19 3/25 4/9 4/14 4/15 4/16 5/3 5/6 5/13 5/16 6/6 11/23 16/19 18/9 22/14 23/15 27/14 27/15 29/13 33/5 33/14 48/25 49/18 53/18 54/11 56/18 57/1 60/8 60/8 66/13 70/24</p> <p>Mr. Barreto [4] 3/15 3/19 4/15 4/16</p> <p>Mr. Binsol [16] 3/11 3/14 4/14 5/13 5/16 6/6 11/23 16/19 22/14 23/15 33/5 33/14 48/25 60/8 60/8 66/13</p> <p>Mr. Binsol's [2] 18/9 56/18</p> <p>Mr. Karlsson [1] 49/18</p> <p>Mr. Nudelman [4] 3/12 3/15 4/9 5/6</p> <p>Mr. Nudelman's [1] 27/15</p> <p>Mr. Stanoch [7] 3/25 5/3 27/14 29/13 53/18 54/11 57/1</p> <p>Mr. Stanoch's [1] 70/24</p> <p>MS [3] 69/18 69/25 70/1</p> <p>Ms. [22] 4/3 4/6 6/21 14/7 15/13 20/22 22/21 25/25 26/10 32/13 33/19 47/7 50/10 51/19 53/13 57/11 58/6 72/6 77/22 78/24 79/12 84/14</p> <p>Ms. Lockard [17] 4/6 6/21 14/7 15/13 20/22 22/21 25/25 26/10 32/13 50/10 53/13 57/11 72/6 77/22 78/24 79/12 84/14</p> <p>Ms. Lockard's [5] 4/3 33/19 47/7 51/19 58/6</p> <p>much [9] 15/8 15/8 15/8 33/21 58/21 59/16 67/17 68/15 85/18</p> <p>multiple [1] 48/17</p> <p>mute [3] 20/5 53/14 54/13</p> <p>my [19] 3/24 6/6 9/8 24/3 24/7 27/24 28/5 29/2 31/21 32/8 32/15 39/24 41/12 56/7 60/7 71/1 81/3 83/11 83/14</p> <p>Mylan [59] 11/9 11/9 11/13 11/25 12/8 12/10 12/10 12/11 12/15 12/18 12/19 13/11 13/22 14/1 14/12 14/25 15/2 15/7 15/23 16/8 16/15 18/14 18/15 18/19 18/21 18/23 18/23 18/25 20/8 20/10 21/19 21/23 23/10 23/20 26/23 26/24 27/2 40/12 42/21 53/14 54/14 54/14 54/24 55/9 65/21 66/2 66/7 66/17 66/18 66/19</p>
--	---	--	--	--

M Mylan... [9] 68/5 68/6 68/9 71/2 71/14 72/5 73/23 73/24 73/25 Mylan's [6] 11/22 12/24 13/9 19/6 66/4 72/17 Mylan/Matrix [1] 66/19 myself [1] 56/16	13/16 14/14 15/16 15/17 16/4 16/22 17/5 22/11 31/4 31/5 34/2 34/18 37/7 39/15 44/7 49/2 49/7 50/4 61/7 77/24 78/4 nitroso [1] 38/10 nitrous [2] 37/9 46/4 njd.uscourts.gov [1] 1/22 no [37] 5/7 6/15 6/25 10/4 15/4 18/23 18/24 23/21 23/24 26/8 26/10 28/11 31/8 39/2 39/2 44/18 45/15 47/8 47/8 49/16 53/15 54/12 59/11 59/16 59/18 63/14 68/12 69/21 70/1 72/7 73/10 75/8 77/5 80/14 80/17 80/18 81/22 nobody [3] 63/21 69/22 69/25 non [2] 63/7 65/5 non-U.S [2] 63/7 65/5 none [3] 12/25 61/6 68/13 nonhearsay [5] 20/13 34/6 35/3 37/20 50/2 not [159] notable [1] 6/10 note [6] 32/15 43/6 44/6 50/13 58/13 83/5 noted [1] 48/8 nothing [8] 6/19 10/24 12/14 31/13 68/15 68/19 68/23 71/6 notice [23] 20/14 23/12 23/12 23/15 23/24 23/25 24/12 29/16 33/25 34/8 34/22 35/23 35/25 36/8 36/10 36/21 37/20 38/14 44/13 45/21 45/21 50/2 50/7 noticed [4] 19/19 20/15 22/7 33/24 notwithstanding [1] 65/23 now [30] 3/9 4/20 9/9 9/16 9/20 10/18 12/7 15/5 18/6 18/13 18/15 18/18 19/5 19/24 22/5 23/11 35/11 38/18 46/24 50/8 52/22 57/18 57/18 58/2 59/10 70/6 71/22 82/4 83/23 84/11 Nudelman [7] 3/12 3/15 3/24 4/9 5/6 32/4 59/24 Nudelman's [3] 3/21 27/15 27/16 number [14] 1/3 9/20 18/11 20/12 33/6 34/4 34/5 34/5 34/7 49/2 66/17 66/22 66/23 77/15 NW [1] 2/3	30/12 38/17 43/20 56/22 objection [45] 5/7 6/12 6/16 6/25 7/12 7/12 8/1 8/24 8/24 8/25 9/17 10/13 18/22 25/8 26/19 30/6 30/11 32/19 39/25 42/1 43/3 46/21 47/23 48/3 48/5 48/16 50/5 51/8 53/11 56/24 57/11 58/4 58/8 58/11 60/7 65/14 65/22 74/7 74/8 74/22 78/19 81/13 81/22 83/14 83/15 objectionable [1] 6/20 objections [18] 3/10 6/22 18/11 23/14 25/9 27/8 27/10 27/18 30/8 31/24 33/5 33/6 40/20 41/19 47/7 47/20 55/5 58/6 obligation [1] 38/20 obviously [5] 7/23 20/11 45/14 48/6 76/13 occasion [1] 36/8 occur [3] 46/1 81/2 81/3 occurred [2] 63/1 81/2 October [2] 1/9 86/5 off [13] 24/12 24/25 28/25 29/16 29/18 33/11 36/11 36/15 50/10 54/11 58/8 60/19 78/24 offers [1] 75/8 official [4] 1/21 36/13 81/7 85/24 offline [1] 17/7 often [1] 34/22 oh [17] 12/23 12/24 15/6 15/21 25/17 38/19 53/9 53/16 58/12 61/22 75/13 79/4 80/6 80/18 80/21 81/3 81/18 okay [68] 5/10 17/8 17/20 29/11 29/20 30/9 31/25 32/5 32/9 32/10 32/11 32/15 41/3 42/5 42/20 42/23 42/24 46/22 47/3 47/18 47/19 51/2 51/20 52/11 53/12 53/13 53/14 53/22 54/2 54/7 54/9 55/19 56/1 56/14 57/6 57/14 57/23 58/10 58/12 58/14 58/18 58/25 59/3 59/7 59/21 59/22 63/17 65/16 68/6 68/10 70/5 70/17 74/19 74/21 81/18 81/21 81/23 82/12 82/17 83/21 84/6 84/13 84/15 84/23 85/3 85/8 85/13 85/16 old [1] 64/17 one [50] 2/6 9/7 10/5 10/17 12/17 16/9 17/7 18/24 21/1 22/25 23/2 23/2 25/6 26/7 29/1 32/12 33/14 33/21 34/4 34/7 37/10 42/9 44/14 45/3 45/15 46/17 49/18 50/13 50/23 51/4 55/7 55/20	56/3 59/25 61/21 62/11 63/14 66/17 66/22 69/19 69/21 71/7 71/25 74/23 77/15 78/10 78/11 80/13 82/15 84/1 online [2] 6/7 7/8 only [10] 5/12 6/6 42/12 58/4 58/11 59/15 61/1 65/4 71/24 80/15 open [1] 12/10 opens [1] 13/25 opponent [3] 9/14 20/11 26/25 ordeal [1] 63/5 order [5] 63/8 64/14 71/4 84/25 85/2 originally [1] 4/23 Orleans [1] 1/19 Oshri [2] 68/19 73/16 other [46] 6/10 6/22 7/10 7/15 7/24 8/4 8/12 8/15 9/5 9/23 9/24 10/2 10/4 10/10 11/8 11/20 13/17 14/14 18/19 24/10 24/10 24/21 30/17 31/5 35/8 44/24 46/11 46/15 49/8 49/18 56/22 60/4 60/5 62/19 63/7 64/3 64/12 64/20 71/6 73/1 75/19 79/11 79/21 81/2 81/3 84/1 others [2] 9/9 62/11 otherwise [1] 16/18 our [16] 4/1 6/10 8/12 8/15 8/18 8/22 18/22 26/1 26/7 47/22 48/16 53/10 54/8 75/8 77/16 84/8 ours [1] 72/17 ourselves [1] 57/15 out [48] 4/25 8/15 8/18 12/18 15/7 15/12 15/13 15/23 16/13 17/1 19/24 20/4 20/5 23/4 26/11 26/21 27/3 27/18 33/4 34/3 38/2 38/9 42/6 42/20 43/7 43/18 51/6 52/8 53/14 54/13 54/20 54/25 55/9 55/19 55/23 57/21 57/22 57/25 58/1 61/11 61/21 63/6 63/24 63/25 69/24 73/14 73/19 83/13 outcome [3] 27/8 77/11 77/20 outcomes [1] 77/10 outside [5] 30/18 48/5 61/10 75/6 77/14 outstanding [1] 3/18 outweigh [1] 10/14 over [7] 3/22 4/22 5/3 27/14 27/15 64/12 74/3 overall [3] 44/12 48/22 80/17 overconcern [1] 20/4 overrule [3] 25/8 50/5 81/13 overruled [2] 31/24 46/21	oversee [1] 62/22 oversight [3] 38/5 46/13 61/17 overstated [1] 32/2 own [5] 12/5 12/6 24/18 54/8 79/10
N N-nitrosamine [1] 33/23 N.W [1] 2/10 name [1] 83/22 nameless [1] 83/22 nature [4] 10/14 44/5 44/11 56/19 NDA [1] 68/8 NDEA [5] 12/14 13/11 14/25 16/15 60/21 NDMA [56] 7/19 12/4 12/4 12/12 12/13 12/14 12/22 12/24 15/10 15/20 19/15 19/17 19/18 20/2 20/15 20/18 21/3 24/20 24/23 25/2 34/11 34/13 34/13 34/19 35/5 35/9 35/12 35/21 35/24 37/11 37/22 38/1 39/13 43/25 44/5 44/8 44/10 44/15 44/22 45/1 45/2 45/5 45/9 45/15 46/1 46/5 46/18 48/8 60/21 61/23 65/2 67/5 69/19 70/2 71/8 76/18 NDMAs [1] 48/15 NE [1] 2/15 necessarily [2] 14/10 26/5 need [12] 6/1 6/17 7/4 11/16 14/17 14/19 21/8 21/22 27/16 52/4 54/25 71/3 needed [2] 3/17 21/12 needs [3] 71/3 72/12 84/3 negotiate [1] 17/6 negotiation [1] 8/14 never [7] 23/7 36/3 38/4 38/6 38/8 46/16 46/19 new [10] 1/1 1/8 1/19 2/7 2/7 2/10 2/20 2/20 42/1 80/4 next [9] 17/23 17/25 25/19 47/9 54/15 79/6 79/6 79/19 81/24 NIGH [1] 2/2 NINA [1] 2/10 nitric [1] 22/16 nitrite [3] 21/5 22/16 37/8 nitrosamine [14] 16/11 18/21 22/9 24/9 24/14 24/19 33/23 37/6 60/10 63/16 64/15 65/5 65/8 75/3 nitrosamine-type [1] 64/15 nitrosamines [22] 13/6	N p.m [5] 1/9 3/3 59/2 59/2 85/23 page [46] 5/16 5/18 10/18 10/22 16/8 17/16 18/8 25/2 25/20 26/11 29/24 29/25 30/11 31/20 31/20 40/11 42/3 42/16 42/24 43/11 43/11 47/2 50/18 51/3 51/12 51/13 52/23 54/18 55/15 55/22 55/25 56/14 57/19 58/3 58/5 58/7 58/16 65/16 69/5 70/8 70/20 71/20 74/13 78/25 81/14 82/11 page 100 [1] 52/23 page 104 [1] 54/18 page 134 [2] 55/15 55/22 page 171 [1] 55/25 page 184 [1] 56/14 Page 198 [1] 57/19 page 200 [3] 58/3 58/5 58/16 page 200:15 [1] 58/7 page 210 [2] 65/16 74/13 page 212 [4] 69/5 70/8 70/20 71/20 page 218 [2] 78/25 81/14 page 221 [1] 82/11 page 23 [1] 5/18 page 41 [2] 5/16 10/22 page 43 [1] 17/16 page 56 [1] 18/8 page 57 [1] 26/11 page 61 [1] 29/25 Page 63 [1] 29/24 page 64 [3] 30/11 31/20 31/20 page 66 [1] 25/20 page 74 [1] 40/11 page 75 [2] 42/3 42/16 page 79 [2] 42/24 43/11 page 85 [1] 43/11 page 91 [1] 47/2 page 98 [1] 50/18 page 99 [3] 51/3 51/12 51/13 pages [3] 17/12 22/7 25/10 parcel [2] 27/2 44/11 part [24] 14/25 15/13 16/13 17/2 18/22 19/18 21/9 22/14 25/6 27/1 41/25 43/24 44/11 44/13 51/6 51/25 67/3 67/4 67/16 68/2 70/8 71/13 72/22 79/7 particular [8] 18/11 20/4 20/25 21/1 25/1 26/2 26/21 31/7			

<p>P parties [2] 28/2 85/1 parts [1] 67/9 party [5] 1/20 2/4 9/14 20/11 26/25 past [2] 25/1 25/4 patent [38] 31/8 32/21 32/22 33/4 33/11 33/20 34/23 36/4 36/7 36/11 36/11 36/12 37/7 38/1 38/10 38/21 38/25 39/6 39/7 39/14 39/17 39/21 40/5 40/6 40/13 40/16 40/17 40/25 41/1 41/2 41/9 41/9 41/11 41/12 41/13 41/24 49/10 49/24 patents [4] 33/9 34/23 36/5 36/12 path [1] 11/16 pause [3] 23/13 74/2 82/14 pausing [1] 43/13 Payor [2] 1/20 2/4 peak [13] 60/16 60/18 60/19 60/19 60/20 61/3 61/3 63/2 63/13 63/18 63/21 63/25 64/20 peaks [3] 61/7 61/20 62/8 pejorative [1] 22/5 Pending [1] 27/8 Pennsylvania [1] 1/15 people [2] 73/17 81/5 per [4] 19/19 20/17 67/9 67/16 perfectly [1] 16/16 period [2] 18/17 61/2 permitted [1] 9/13 person [6] 7/17 9/19 22/6 22/7 23/2 23/3 personal [5] 30/18 48/5 61/10 63/4 77/14 personally [1] 28/3 personnel [5] 66/19 66/20 67/13 76/3 76/4 perspective [2] 3/24 75/8 persuaded [1] 46/20 pesticide [1] 46/8 Ph.D.s [1] 6/10 Pharma [2] 2/17 2/20 pharmaceutical [11] 2/7 2/8 2/11 2/12 2/16 8/7 44/23 45/11 46/12 48/24 49/15 pharmaceuticals [4] 2/17 2/21 44/19 45/19 Philadelphia [1] 1/15 pick [1] 71/8 piece [3] 8/16 11/9 66/12 piecing [1] 21/10 Piedmont [1] 2/15 place [2] 62/7 62/13 plaintiff [2] 10/10 43/22 plaintiff's [1] 79/13 plaintiffs [15] 1/16 3/19 5/22 8/13 8/20 10/21 15/9 15/21 32/21 35/19 36/22 43/18 47/21 60/18 85/1</p>	<p>plaintiffs' [4] 3/15 3/23 21/18 75/13 plan [2] 3/22 27/17 plants [1] 46/8 play [7] 3/19 5/23 6/8 6/9 8/21 8/21 9/13 please [5] 54/12 56/4 59/18 59/18 69/1 plenty [2] 36/23 67/10 PLLC [1] 2/2 point [8] 7/25 12/8 24/7 32/1 38/22 61/22 70/24 72/19 pointing [1] 26/21 policy [1] 81/8 portion [1] 12/22 position [4] 4/2 4/4 6/5 9/8 positions [1] 6/24 possession [3] 24/22 49/10 49/19 potent [1] 43/8 potential [10] 14/11 19/16 20/14 25/1 35/2 37/20 38/16 44/1 49/14 77/2 potentially [3] 8/4 12/18 20/6 ppm [1] 67/9 preclude [2] 8/2 83/8 predates [1] 77/7 predating [3] 44/4 45/24 76/14 preempt [1] 47/7 prejudice [10] 8/24 9/16 11/6 19/4 23/13 43/3 48/4 65/18 68/16 74/22 prejudicial [15] 6/8 9/15 9/18 9/22 10/14 13/25 14/16 15/9 33/15 38/22 39/8 60/15 61/9 63/2 63/13 preparation [1] 40/14 prepared [7] 4/14 9/20 60/12 62/24 78/2 78/5 78/5 presence [3] 21/4 21/5 35/20 present [3] 2/22 14/20 17/19 presented [4] 13/19 13/23 27/11 36/6 presents [3] 45/21 68/16 68/17 pressure [1] 10/11 Presumably [1] 13/17 pretrial [2] 84/25 85/2 principles [1] 12/4 Princeton [2] 2/8 2/12 prior [16] 5/19 16/25 22/25 24/21 34/9 34/9 34/15 38/2 38/13 38/15 42/9 45/16 48/8 49/12 52/13 53/2 probably [5] 5/8 17/8 17/22 53/3 57/1 probative [13] 7/2 7/14</p>	<p>7/20 10/15 25/9 35/15 37/24 45/10 49/12 61/1 75/8 76/22 77/21 problem [11] 14/10 19/3 21/10 25/11 31/8 40/10 41/17 70/5 70/17 71/1 83/11 problematic [1] 17/9 proceed [1] 3/5 proceedings [4] 1/23 3/1 85/23 86/2 process [16] 15/18 18/20 18/20 30/22 31/7 45/5 45/11 48/23 49/15 61/17 61/18 61/24 62/2 62/4 62/10 69/12 processes [7] 44/24 45/7 45/25 46/14 61/19 62/7 62/13 processing [3] 45/1 45/8 46/9 produce [1] 60/17 produced [5] 1/24 33/7 48/21 60/2 66/17 producing [1] 60/4 product [25] 11/13 35/2 37/21 38/16 49/5 60/17 60/17 61/7 62/1 62/1 63/7 64/17 66/2 66/2 66/4 66/4 66/25 67/16 67/20 70/4 75/5 75/16 76/7 76/10 77/3 production [3] 32/25 33/14 72/17 products [3] 1/4 48/24 67/12 program [1] 48/12 prompt [1] 16/4 proper [5] 10/7 36/15 40/18 62/5 64/1 properly [4] 36/6 61/19 74/24 78/2 proposal [1] 72/18 propose [1] 8/16 proposed [1] 21/14 prosecution [1] 34/23 Protection [1] 43/4 prove [5] 11/21 12/10 20/9 20/16 38/1 provide [6] 3/14 3/21 3/21 5/21 30/21 72/15 provided [1] 54/5 providing [1] 18/16 PTO [1] 27/25 public [9] 34/21 35/13 36/8 36/17 37/19 37/19 38/13 38/14 48/15 publicly [9] 33/19 34/9 34/24 36/4 37/15 37/24 38/2 39/4 40/13 published [3] 34/24 41/1 41/6 pull [5] 10/5 59/9 82/20 83/11 83/23 pulled [3] 33/4 33/11 36/15 pulling [1] 83/12</p>	<p>punt [1] 19/20 purchasing [1] 62/6 purpose [3] 35/3 37/20 50/2 purposes [3] 20/13 34/6 50/6 put [11] 4/11 9/4 9/13 12/5 20/13 24/23 36/15 38/14 49/24 75/15 83/6 puts [1] 37/19 putting [3] 6/22 9/3 83/17 Q qualifications [1] 9/21 quality [20] 7/16 7/17 8/5 22/6 22/7 23/2 23/8 37/18 38/5 38/5 46/13 49/4 61/14 61/17 61/24 62/16 76/12 79/16 79/17 81/4 quantifying [1] 70/3 quenching [1] 69/11 question [46] 5/17 12/20 22/19 23/9 26/8 26/11 30/20 30/24 31/6 31/19 38/18 40/5 40/11 40/15 40/18 40/22 41/25 42/1 42/10 43/9 46/17 46/19 47/22 51/16 51/22 52/2 53/12 53/13 53/22 53/23 54/13 54/15 56/21 57/2 57/21 57/21 58/5 58/7 70/7 70/21 72/10 77/25 79/6 79/7 80/5 83/18 questioning [23] 11/13 11/20 12/23 16/5 18/19 21/17 22/20 23/9 23/17 25/18 25/19 33/2 43/1 47/5 47/6 48/20 59/23 60/8 60/14 61/8 62/9 71/14 81/14 questions [24] 12/4 15/24 18/16 19/14 19/25 20/3 20/20 21/18 21/18 31/1 31/9 31/15 40/8 46/2 49/16 49/17 51/21 57/2 62/20 62/20 62/25 66/22 67/7 73/11 quick [1] 21/24 quickly [1] 24/5 quote [3] 24/9 41/2 43/23 quote-unquote [2] 24/9 43/23 R raise [1] 5/19 raised [1] 9/25 RASO [1] 2/2 rather [1] 4/21 rationale [2] 51/1 53/2 RDR [1] 86/5 RDR-RMR-CRR-CRC [1] 86/5 RE [1] 1/3 reaction [1] 67/4 reactions [2] 45/8 45/25 read [4] 56/16 70/7 70/10</p>	<p>80/19 reading [2] 58/5 73/20 ready [2] 3/5 3/24 Real [1] 21/24 really [14] 11/8 11/15 12/14 14/16 23/12 43/4 43/8 53/11 64/5 74/4 75/14 79/10 81/11 81/25 reason [5] 9/3 40/12 40/17 43/5 45/15 reasonable [1] 46/12 reasons [4] 16/3 19/5 44/14 60/15 recall [2] 37/17 83/20 recalls [7] 24/13 34/9 44/4 45/24 49/12 76/14 77/14 receiving [1] 66/21 recent [1] 14/24 recently [1] 15/8 Recess [1] 59/2 record [14] 12/3 12/6 12/21 14/24 16/4 28/25 32/1 34/21 40/24 41/7 64/11 65/24 70/20 86/2 recorded [1] 1/23 records [5] 19/13 20/19 24/18 33/1 50/1 redact [1] 20/5 reducing [1] 17/17 reference [9] 12/19 13/23 14/9 17/9 17/9 54/24 55/9 83/2 83/7 references [2] 35/18 60/3 referencing [1] 48/15 reflect [1] 34/1 regard [1] 73/6 regarding [8] 49/3 60/22 62/15 64/14 66/24 69/15 76/15 77/2 regardless [2] 20/12 20/16 regulatory [2] 48/22 49/13 relate [4] 17/10 66/6 66/7 66/7 related [9] 3/6 33/9 47/10 60/4 60/12 63/6 65/5 77/24 82/22 relates [4] 11/7 43/5 59/23 60/7 relative [1] 44/3 relevance [12] 11/6 19/4 23/24 32/20 33/15 43/3 43/19 48/3 51/6 65/18 69/2 74/22 relevant [33] 7/2 7/20 9/7 9/7 9/8 9/9 11/12 13/21 13/25 14/16 17/11 25/8 30/21 30/25 34/25 35/15 36/19 37/23 44/3 44/23 45/15 50/6 56/5 60/5 63/10 63/20 68/15 68/20 68/23 74/1 76/11 77/21 80/23 reliable [1] 47/25 rely [1] 38/24</p>
---	---	---	--	--

R	29/20 29/22 29/23 30/8 30/9 30/10 31/10 31/18 32/10 32/14 32/17 41/22 41/24 42/7 42/24 46/23 46/24 47/16 47/16 50/8 50/19 51/24 51/25 52/23 52/23 53/19 55/15 55/16 55/22 55/24 56/10 56/14 57/4 57/5 57/11 57/12 57/18 57/19 58/1 58/2 58/11 58/14 58/15 58/19 59/10 65/17 74/12 74/13 74/16 78/19 78/20 78/21 78/22 78/22 78/25 79/25 80/2 80/13 81/24 82/10 84/11	79/21 83/23 says [29] 15/13 15/15 16/8 16/15 21/2 23/18 23/18 23/19 23/20 30/22 34/10 35/10 35/17 37/16 38/7 39/15 39/15 40/6 41/1 44/2 46/6 60/18 63/2 72/4 72/4 75/11 77/10 79/14 80/10 Schneider [1] 63/5 Schneider's [2] 64/13 65/4 scientific [3] 34/24 47/21 48/7 scope [4] 30/19 48/5 61/10 76/23 scroll [1] 77/1 scrub [1] 12/18 se [1] 20/17 search [2] 37/14 37/19 searches [1] 39/6 second [1] 82/15 Secondly [1] 35/25 seconds [6] 11/19 39/9 39/10 45/22 68/25 82/18 section [1] 48/16 see [26] 4/20 4/25 7/18 9/17 12/3 13/2 15/10 22/14 36/21 38/17 40/10 44/2 47/5 47/13 50/15 51/18 53/9 53/12 53/24 63/22 73/8 74/19 78/16 79/21 81/11 83/2 seeing [2] 71/17 80/25 seeking [1] 83/8 seem [2] 17/3 63/3 seems [2] 50/19 53/8 seen [4] 6/23 7/25 33/7 49/25 semi [1] 43/25 semi-volatile [1] 43/25 sending [1] 18/21 66/21 sense [3] 22/5 27/5 72/16 sensitive [2] 67/8 67/14 sent [8] 3/25 27/15 27/16 49/11 61/4 73/21 75/25 80/15 set [6] 18/12 39/3 39/3 39/7 59/7 81/1 setting [1] 13/24 79/5 setup [1] 22/14 severed [1] 15/6 sexy [1] 79/13 share [1] 85/5 she [4] 22/23 22/24 83/16 83/17 sheet [3] 43/2 43/16 53/10 shift [1] 79/2 shoehorn [1] 38/19 shorthand [1] 75/2 should [28] 4/1 4/4 5/8 12/8 15/22 15/23 16/1 16/9 16/9 17/7 20/22 20/23 26/24 40/9 42/6 46/23 51/6 52/18 61/10 61/16 61/17 61/18 61/19	61/24 63/23 65/2 76/9 78/14 shouldn't [1] 36/23 show [9] 16/20 16/25 23/24 24/10 35/23 35/25 36/21 39/4 61/1 showing [7] 16/12 44/12 50/7 61/15 61/23 65/3 71/7 shown [3] 33/7 56/20 56/22 shows [4] 23/12 23/25 35/12 50/1 sic [1] 69/8 side [1] 27/24 significantly [2] 4/20 17/13 similar [5] 18/20 18/20 19/10 49/21 74/22 similarly [1] 47/20 simply [4] 19/24 40/3 54/17 71/16 since [1] 10/3 single [2] 60/12 63/24 sir [9] 5/14 14/22 17/21 18/2 18/5 58/3 58/15 58/24 82/9 site [2] 62/11 74/25 sits [1] 59/24 sitting [1] 38/8 six [1] 47/10 SKADDEN [2] 2/5 2/9 SLATE [2] 2/5 2/9 smiling [1] 38/22 Smith [1] 2/24 so [194] sodium [12] 21/5 22/16 34/12 37/8 67/3 69/8 69/10 69/18 70/11 70/21 72/11 72/20 Solco [2] 2/8 2/12 solution [1] 21/13 solutions [1] 45/2 solvent [1] 21/4 solvents [5] 22/10 69/8 70/12 70/22 72/21 some [24] 5/22 5/24 9/23 10/8 10/8 11/19 11/20 14/14 14/14 17/8 20/3 26/19 29/21 37/13 38/20 43/5 49/8 51/19 56/18 64/20 64/21 72/15 78/6 79/21 somebody [1] 83/22 somehow [1] 63/19 someone [5] 7/17 51/4 52/3 65/21 80/12 something [23] 5/1 10/1 12/16 13/8 20/4 20/23 22/6 24/13 33/6 38/7 45/21 49/24 53/14 61/21 62/1 64/22 67/20 68/22 72/16 78/7 79/14 79/18 83/18 somewhat [2] 7/9 8/25 somewhere [1] 15/23 sophisticated [1] 46/12	sorry [21] 4/10 14/7 14/8 16/7 24/6 25/16 28/10 39/23 42/8 47/15 51/11 52/12 53/15 53/16 53/18 54/10 59/17 61/14 70/18 78/24 82/24 sort [6] 25/19 35/10 40/19 64/6 68/14 68/17 sounds [3] 4/6 51/18 85/13 sourced [1] 51/19 sourcing [2] 50/24 62/12 South [1] 64/21 speak [5] 10/9 27/23 48/10 80/8 80/8 speaking [1] 81/5 speaks [1] 79/3 special [3] 1/11 3/2 69/23 specific [11] 12/16 13/8 20/23 26/22 51/21 67/8 67/13 67/17 69/17 70/3 78/11 specifically [7] 39/11 44/22 46/1 49/5 63/6 66/24 71/20 specifics [1] 77/10 spectrometry [2] 64/19 67/8 spelled [1] 82/24 spend [1] 56/8 sphere [2] 35/13 38/13 spirit [1] 57/11 split [1] 57/15 spreadsheet [19] 3/10 10/25 11/3 21/14 28/6 28/13 28/17 29/4 31/18 31/21 40/2 41/21 50/19 54/5 59/9 65/15 82/8 83/2 83/6 Square [1] 2/3 squarely [1] 76/11 stage [1] 8/15 stamp [1] 50/1 stand [2] 3/12 7/22 standpoint [1] 49/4 STANOCH [8] 1/14 3/25 5/3 27/14 29/13 53/18 54/11 57/1 Stanoch's [1] 70/24 start [1] 29/25 started [1] 60/19 starting [5] 50/18 55/22 70/7 81/14 82/11 starts [2] 26/7 47/1 state [1] 48/7 STATES [2] 1/1 36/10 stating [1] 41/6 stereography [1] 1/23 step [2] 11/19 15/16 steps [2] 22/15 61/17 STEVEN [1] 2/15 still [8] 4/24 7/11 8/3 17/17 20/15 52/24 74/1 84/18 stop [3] 19/8 32/9 55/1 story [4] 13/9 13/22 15/7 44/12
----------	---	---	--	--

S	24/18 25/4 36/23 43/24 48/7 48/14 48/24 60/9 60/12 60/24 62/18 62/23 62/24 63/9 73/17 77/17 78/2 84/1 talked [3] 18/15 49/9 53/19 talking [32] 7/16 7/18 12/22 14/10 14/12 14/25 18/13 26/21 27/4 30/15 30/16 30/17 35/7 40/16 40/16 44/5 44/7 46/5 46/7 52/24 60/16 64/24 65/24 66/2 66/10 67/13 67/22 69/5 72/3 76/5 76/7 79/17 talks [9] 15/17 35/22 45/25 49/5 64/25 68/14 78/8 78/11 81/6 targets [1] 27/25 TEAMS [2] 1/6 3/1 technical [3] 43/2 43/16 81/4 technology [1] 76/5 tell [4] 25/10 57/10 60/15 71/19 temporally [1] 15/1 ten [4] 39/9 39/10 45/22 68/25 tenuous [1] 38/21 terms [13] 14/20 20/1 22/15 27/25 34/2 34/3 34/11 40/15 43/23 62/9 70/10 70/21 77/21 test [7] 22/8 69/6 69/23 75/18 76/4 76/22 78/4 tested [2] 62/15 76/1 testified [1] 15/21 testifies [1] 13/18 testify [2] 16/2 18/24 testifying [1] 16/1 testimony [46] 6/18 7/1 7/13 8/2 8/20 9/14 15/10 15/10 16/11 16/18 17/12 18/13 20/3 21/20 23/5 27/3 28/6 28/7 28/9 28/13 28/17 29/3 29/4 30/10 31/17 37/17 39/2 39/25 41/20 43/10 43/15 47/1 55/21 56/9 56/18 60/3 65/14 68/14 71/10 72/20 74/4 75/15 76/25 78/15 78/16 82/10 testing [65] 7/18 8/7 22/8 22/17 30/16 31/3 44/9 45/4 48/11 48/12 48/13 48/24 49/3 49/3 49/4 49/13 50/3 56/19 56/20 56/25 60/9 61/15 61/15 61/25 62/5 62/8 62/16 64/14 64/16 64/18 64/19 66/24 66/25 67/2 67/11 67/21 67/22 67/23 69/6 69/15 69/16 69/17 71/8 73/22 73/23 75/7 75/23 76/6 76/9 76/12 76/13 76/16 76/20 77/17 77/17 77/19 77/24 77/25 77/25	78/2 78/7 78/9 78/11 78/13 79/16 tethered [1] 67/17 tetrazole [2] 15/16 22/10 Teva [90] Teva's [25] 9/20 11/7 11/10 11/11 11/24 16/21 19/13 19/14 19/15 19/25 22/10 24/17 24/22 34/1 34/17 39/12 44/12 48/21 49/10 49/12 49/19 60/4 61/16 62/22 79/15 Teva-related [1] 3/6 Thank [18] 19/9 22/2 24/6 29/10 32/16 33/18 37/1 42/18 48/19 52/20 59/1 59/8 66/16 85/16 85/18 85/19 85/20 85/22 Thanks [2] 58/25 85/21 them [6] 4/20 24/1 27/18 27/19 30/3 38/14 theoretically [1] 37/11 therefore [1] 39/8 these [38] 5/21 10/3 15/19 15/24 16/2 19/14 21/10 21/18 23/15 23/22 25/3 25/4 25/10 27/9 27/17 35/4 35/9 40/9 46/2 46/10 46/15 47/20 48/17 57/2 60/7 62/20 64/3 65/7 65/20 66/6 66/6 66/13 67/15 69/4 72/25 75/14 78/5 81/4 they'll [1] 31/23 they're [12] 9/8 18/25 20/11 34/14 36/22 43/5 43/7 52/5 52/8 63/17 73/17 76/20 they've [4] 5/25 10/3 18/13 75/2 thing [8] 24/18 24/22 33/14 61/1 63/21 64/4 75/19 84/12 things [16] 3/12 15/19 15/25 17/10 23/22 24/24 25/5 26/2 44/11 45/2 46/11 46/15 52/19 58/8 67/15 70/1 think [146] Third [3] 1/20 2/3 2/4 Third-Party [2] 1/20 2/4 Thirty [3] 59/11 59/11 59/12 Thirty-four [1] 59/11 Thirty-three [2] 59/11 59/12 this [351] THOMAS [2] 1/11 3/2 though [6] 3/16 4/19 4/24 18/25 32/8 68/13 thought [11] 4/6 5/7 16/14 22/22 22/24 38/8 53/16 59/12 83/4 83/5 83/17 thoughts [1] 84/25 three [6] 6/23 11/23 19/12 59/11 59/12 60/7	78/2 4/20 4/25 12/4 13/7 13/22 13/24 19/2 19/2 20/17 21/22 22/13 23/18 25/19 25/22 25/23 26/1 31/20 34/6 36/16 36/24 38/20 39/1 43/11 46/23 47/6 47/16 47/25 49/17 51/20 51/23 52/6 52/9 54/18 55/22 56/16 58/5 58/16 62/2 72/1 72/8 73/10 77/1 79/14 82/3 throughout [1] 56/23 Thursday [8] 4/9 4/13 5/6 17/19 18/4 44/2 84/11 85/9 tie [1] 62/9 tied [1] 40/19 time [27] 5/2 10/11 12/1 12/11 13/18 18/18 21/1 21/6 24/17 24/21 29/1 36/23 39/18 56/8 56/17 58/22 61/2 62/7 62/10 62/14 63/24 64/6 67/12 69/24 69/25 72/4 85/7 timeline [1] 27/20 times [3] 23/12 64/4 67/10 timing [1] 28/3 tipped [2] 24/12 24/25 tire [1] 46/8 title [3] 5/24 8/17 51/2 today [8] 3/22 4/14 5/4 5/12 49/9 52/13 84/23 84/24 together [2] 21/10 24/24 told [1] 24/1 Tony [3] 13/18 21/6 36/24 too [7] 13/9 44/6 52/8 56/3 57/22 58/20 72/24 took [2] 8/15 8/18 topics [14] 13/4 19/18 20/16 22/8 22/9 31/6 32/2 33/23 35/5 49/1 49/3 67/21 69/14 76/12 Torrent [3] 2/20 2/21 2/21 totally [4] 56/4 77/25 78/6 78/7 towards [1] 17/16 toxicological [2] 60/23 60/24 toxicologist [1] 59/24 toxicologists [1] 61/5 toxicology [3] 61/5 63/19 64/1 trailing [1] 80/11 transaction [1] 59/23 Transcriber [1] 86/6 transcript [7] 1/23 18/9 22/13 25/11 40/11 82/21 86/1 transcription [1] 1/24 translate [4] 80/6 80/19 80/22 82/1 translated [1] 41/5	translation [1] 79/15 translations [1] 81/7 TRAURIG [1] 2/14 treatise [1] 47/24 trial [7] 15/5 16/10 18/23 26/25 65/13 73/3 73/25 trimming [1] 58/15 trouble [3] 28/21 69/2 76/25 true [3] 69/7 70/11 70/21 truth [1] 9/6 try [7] 17/7 20/22 29/1 53/14 54/13 58/7 73/12 trying [18] 10/5 11/21 13/15 20/9 20/16 23/14 24/25 34/21 37/25 47/7 47/9 50/10 51/9 61/22 63/17 72/25 81/1 82/20 Tuesday [1] 1/9 turned [1] 61/21 two [18] 4/21 11/19 15/4 19/23 22/7 24/23 25/5 34/5 40/8 50/21 66/23 76/20 78/13 79/7 79/20 82/18 84/9 84/17 type [2] 64/15 64/16 typically [1] 36/6
T			U	
tabs [1] 46/16 take [20] 6/5 8/8 17/3 18/6 21/1 26/6 26/6 34/22 36/8 46/23 46/24 47/15 47/16 51/24 54/16 58/21 59/17 61/17 64/5 84/5 taken [2] 4/25 59/2 takes [14] 11/2 21/15 29/20 29/22 32/10 32/14 32/17 41/22 42/7 50/8 55/24 58/19 65/16 82/3 taking [7] 5/2 11/15 16/13 36/10 73/14 73/18 83/5 talk [24] 14/19 17/7 20/22 22/6 23/2 23/8			U.S [17] 1/7 2/8 2/8 2/12 2/12 36/5 36/5 36/12 60/2 60/11 60/13 60/17 61/7 62/19 63/7 63/16 65/5 Uh [3] 52/1 52/25 82/17 Uh-huh [3] 52/1 52/25 82/17 ultimately [1] 44/14 uncertainty [2] 26/20 56/19 under [11] 21/5 25/3 31/13 35/9 39/20 40/9 50/25 53/2 66/11 68/9 73/9 underlying [3] 41/16 44/25 71/4 undermine [1] 15/9 understand [13] 8/1 9/15 10/6 21/9 27/1 33/1 42/8 65/11 68/21 73/4 74/9 80/1 83/9 understandable [1] 31/19 understanding [2] 34/2 35/1 understood [5] 4/8 10/16 25/13 31/22 81/17 undertook [1] 48/11 unduly [3] 9/18 9/22 15/8 unfair [3] 6/13 15/21 16/7 unfortunate [1] 21/17 Unfortunately [1] 19/11 UNITED [2] 1/1 36/9 universities [1] 6/11 unknown [13] 60/19 60/19 61/2 61/3 61/6 62/1 62/8 63/2 63/13 63/18	

<div>U</div> <div>unknown... [3] 63/21 63/25 64/20 unless [1] 84/24 unlike [2] 7/14 36/2 unnecessarily [1] 14/1 unquote [2] 24/9 43/23 unreasonable [1] 38/16 until [6] 4/1 4/9 4/12 5/6 15/7 59/2 up [29] 13/24 13/25 15/1 18/12 21/6 26/7 31/7 35/11 39/3 39/3 39/7 40/19 46/17 59/9 59/10 62/21 62/25 63/12 69/23 71/8 79/5 79/12 81/1 82/20 83/11 83/12 83/17 83/23 84/4 upon [2] 44/8 82/22 us [30] 3/20 4/18 6/9 11/2 11/16 16/7 18/6 25/18 25/22 29/20 29/22 32/10 32/14 32/17 41/22 42/7 46/23 46/24 47/15 47/16 50/8 54/20 55/20 55/24 56/3 58/19 59/5 65/16 82/3 85/5 USA [1] 2/17 use [16] 11/24 12/3 12/4 13/7 16/4 21/8 22/10 23/14 25/3 37/8 46/3 48/1 69/25 73/12 78/14 79/21 used [19] 11/9 11/11 11/13 13/3 14/23 15/25 16/8 16/9 19/11 20/20 22/19 28/8 28/8 47/21 47/25 49/3 49/4 69/10 73/24 uses [1] 45/7 using [10] 12/9 14/20 16/20 16/25 44/19 45/2 67/1 67/13 69/24 70/1 usually [2] 58/7 80/15</div>	<div>very [15] 37/1 47/10 49/21 52/14 56/23 58/18 63/13 64/11 67/22 70/1 70/3 75/12 75/24 76/19 85/18 via [4] 1/6 3/1 36/12 80/6 VICTORIA [14] 2/14 4/10 8/10 10/7 13/13 16/23 17/15 26/4 26/16 29/9 42/2 47/16 54/21 59/5 video [1] 21/10 videoconference [1] 1/6 videoconferencing [1] 3/1 view [1] 17/16 VINCENT [1] 2/19 VINCENT-ALEXANDR E [1] 2/19 volatile [1] 43/25</div>	<div>weren't [1] 77/2 West [1] 2/6 whatever [1] 71/16 whatsoever [1] 43/19 whether [9] 3/18 37/25 45/10 45/17 46/3 48/8 65/23 76/9 81/8 while [1] 12/2 WHITELEY [2] 1/18 1/18 who's [3] 23/2 59/24 73/20 whole [4] 11/8 14/1 40/19 63/5 whoops [1] 82/3 whose [1] 83/22 why [12] 9/9 11/14 14/19 21/7 28/23 38/17 40/12 43/13 43/20 52/4 54/17 83/5 will [32] 7/16 7/18 8/9 8/9 11/20 13/2 13/3 13/18 21/7 25/8 26/9 26/14 28/17 29/4 29/17 36/5 36/8 41/11 42/15 47/6 50/7 52/9 56/13 57/7 57/9 58/16 58/17 67/15 71/21 75/2 76/19 83/22 willing [2] 17/6 58/9 wise [1] 78/3 wish [1] 73/5 withdraw [14] 40/23 51/22 52/9 55/16 56/3 56/9 56/13 56/24 57/7 57/12 57/24 71/17 71/21 83/15 withdrawing [2] 51/20 55/6 withdrawn [2] 10/12 74/13 withdrew [3] 10/9 10/21 57/11 within [11] 19/1 19/2 31/12 32/25 33/23 47/23 49/11 49/19 65/24 76/12 76/22 without [3] 34/13 36/15 36/16 witness [68] 5/12 5/24 6/1 6/19 7/3 7/14 9/1 9/7 9/10 9/23 10/2 10/2 10/8 13/21 15/20 16/1 17/4 18/23 19/19 19/25 21/22 22/3 22/12 23/1 23/8 23/9 30/15 31/2 31/14 32/2 33/8 33/8 34/1 34/15 35/4 35/17 35/22 36/3 36/16 36/17 36/20 37/4 39/3 39/4 39/5 39/11 39/12 39/22 44/20 48/6 48/13 49/16 56/25 60/9 60/23 61/9 62/16 62/17 63/11 66/23 69/5 69/13 72/8 72/13 72/14 73/10 75/16 76/12 witness's [4] 6/3 9/15 13/4 20/18</div>	<div>witnesses [15] 3/7 5/21 6/10 7/10 7/15 7/25 8/15 9/5 10/4 10/10 27/17 32/24 47/22 49/23 63/9 witnesses' [2] 8/12 32/25 woman [1] 59/25 won't [5] 10/16 10/16 27/5 49/20 49/20 word [5] 12/18 20/8 36/25 42/21 45/11 words [1] 83/17 worked [1] 9/19 working [2] 52/13 52/14 Works [1] 58/23 world [5] 9/17 60/5 63/25 64/18 81/6 wouldn't [3] 9/5 16/2 69/22 writ [1] 35/10 writes [1] 12/13 wrong [2] 25/25 40/1</div>	<div>Y</div> <div>yeah [46] 10/6 26/12 26/17 29/22 29/24 30/23 31/17 32/9 39/24 42/6 43/1 46/20 47/11 47/12 50/5 50/12 51/20 54/7 55/1 55/8 55/18 56/16 57/4 57/23 57/24 64/8 65/11 70/19 71/19 73/7 74/3 74/11 74/15 78/16 79/1 79/24 80/3 81/10 81/20 82/2 82/6 82/7 82/20 84/7 84/15 84/18 years [14] 9/20 11/23 15/4 15/22 19/12 34/9 34/9 34/15 35/13 38/3 38/8 38/12 69/25 73/2 Yep [1] 82/13 yes [54] 3/8 5/14 14/22 14/25 15/18 17/21 18/2 18/5 19/25 21/25 23/18 23/19 25/3 25/24 28/16 29/7 29/8 29/23 30/2 32/15 35/9 35/10 43/24 45/23 47/4 51/18 52/25 54/22 55/3 55/12 55/13 56/11 56/13 58/3 58/15 58/24 59/4 59/8 69/1 69/1 69/18 72/4 72/11 74/18 77/12 79/4 79/4 80/7 80/8 82/9 84/15 84/22 85/18 85/22 yet [3] 27/21 33/25 53/15 York [5] 2/7 2/7 2/10 2/20 2/20 you [196] you'll [6] 12/3 15/10 22/5 22/14 27/25 37/17 you've [1] 49/22 yours [1] 70/24</div>	<div>15/1 16/9 16/10 17/10 17/11 18/18 23/10 23/16 23/22 24/1 32/23 32/25 33/13 33/21 36/2 36/2 36/23 38/6 39/1 40/5 40/12 44/8 44/16 45/4 46/3 46/3 46/19 49/22 55/2 61/13 62/9 62/12 64/24 66/8 73/23 76/1 ZHP's [1] 36/15</div>
<div>V</div> <div>vague [2] 30/13 30/20 vagueness [1] 31/13 validated [1] 78/4 valsartan [48] 1/3 12/24 15/18 34/3 34/13 37/9 40/14 44/9 44/15 45/4 46/4 46/18 51/5 60/2 60/5 61/25 62/3 62/6 64/18 64/19 65/3 66/4 66/5 66/8 66/8 66/24 66/25 67/16 67/24 69/6 69/6 69/11 69/11 69/19 70/4 72/4 73/24 75/4 75/12 75/14 75/23 75/25 75/25 76/5 76/6 76/10 76/10 77/3 value [2] 10/15 75/8 VANASKIE [6] 1/11 3/2 8/14 52/13 55/7 84/4 variety [2] 45/7 45/25 VAUGHN [1] 2/2 version [2] 33/20 36/7 versus [1] 49/9</div>	<div>W</div> <div>wait [3] 4/1 4/4 53/15 walk [1] 13/7 want [25] 5/23 6/8 6/9 8/21 9/12 9/25 14/17 15/12 19/20 21/13 21/15 32/7 38/18 38/24 39/23 49/20 51/15 52/2 56/9 67/25 68/10 68/21 71/9 84/5 85/4 wanted [6] 5/19 22/23 22/24 40/3 68/6 85/13 wants [2] 50/25 51/1 warn [1] 38/14 Washington [2] 2/3 2/11 wasn't [15] 9/25 22/22 24/7 32/3 34/16 34/16 48/13 62/23 62/24 70/9 73/21 77/5 77/15 78/5 83/14 waste [1] 12/10 wastewater [4] 44/9 44/11 45/5 46/2 water [4] 17/11 44/7 44/10 45/2 way [12] 9/3 12/17 13/23 14/4 19/2 34/12 39/5 39/7 62/15 72/5 72/25 73/23 ways [1] 14/14 we'd [1] 22/3 we'll [17] 5/12 7/16 25/11 42/22 42/22 44/1 53/4 53/13 55/1 55/1 57/7 57/24 58/10 65/13 83/24 84/11 84/16 we've [9] 7/15 7/25 22/4 22/5 35/11 36/10 47/20 67/18 67/19 website [1] 33/12 week [3] 28/1 49/18 64/12 weekend [2] 27/14 27/15 weeks [4] 6/23 7/15 15/5 22/5 went [4] 6/6 49/17 62/1 64/12</div>	<div>Z</div> <div>Zhejiang [2] 2/7 2/11 ZHP [43] 2/8 2/12 11/8 11/11 11/25 14/13 14/15</div>			